

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY et al.,

Defendants.

CASE NO. 7:20-CV-00947-DCC

DECLARATION OF MARC E. MAYER

I, Marc E. Mayer, hereby declare as follows:

1. I am an attorney at law, duly licensed to practice law in the State of California. I have been admitted on a *pro hac vice* basis to practice before this Court in connection with this matter. I am, through my professional corporation, a partner of the law firm Mitchell Silberberg & Knupp LLP, counsel of record for Defendants MG Freesites Ltd. and Mindgeek S.à r.l. (together, “Defendants”) in this action. I make the following declaration in support of Defendants’ Motion to Compel certain of the Plaintiffs in this action to appear for an independent mental evaluation (“IME”) pursuant to Rule 35 of the Federal Rules of Civil Procedure. I make all of the following statements of my own personal knowledge and, if called as a witness, could and would testify competently thereto.

2. Defendants’ Motion to Compel pertains to six (out of nine) of the Plaintiffs in this action—namely, Jane Does 2, 4, 5, 6, 7, and 9 (referred to herein and in Defendants’ Motion as “Doe 2,” “Doe 4,” and so on, and collectively as the “Subject Plaintiffs”). As discussed *supra*, following their depositions, Defendants agreed not to seek IMEs for the other three Plaintiffs in this action—namely, Jane Does 1, 3, and 8. There is one other relevant plaintiff—namely, the

plaintiff in the separate action titled *Doe v. Murphy*, No. 7:21-CV-03193-DCC, who is referred to as “Doe 10” herein and in Defendants’ Motion. Doe 10’s deposition was scheduled for April 26, 2024, but had to be postponed because Doe 10 failed to produce her medical records prior to the deposition. To date, Doe 10 still has not provided her relevant medical records, and thus her deposition has not yet been rescheduled. Accordingly, Defendants cannot at this time fully evaluate the need for an IME of Doe 10. To the extent necessary, and if Doe 10 refuses to consent, Defendants will file a motion to compel Doe 10’s IME after the deposition is complete.

3. On August 27, 2021, each of the Subject Plaintiffs served Answers to Defendant MG Freesites, Ltd.’s First Set of Interrogatories (the “Interrogatory Answers”). Attached hereto as **Exhibits A through F** are true and correct copies of excerpts of the Subject Plaintiffs’ Interrogatory Answers. Specifically:

- a. Doe 2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of Doe 2’s Interrogatory Answers.
- b. Doe 4. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of Doe 4’s Interrogatory Answers.
- c. Doe 5. Attached hereto as **Exhibit C** is a true and correct copy of excerpts of Doe 5’s Interrogatory Answers.
- d. Doe 6. Attached hereto as **Exhibit D** is a true and correct copy of excerpts of Doe 6’s Interrogatory Answers.
- e. Doe 7. Attached hereto as **Exhibit E** is a true and correct copy of excerpts of Doe 7’s Interrogatory Answers.
- f. Doe 9. Attached hereto as **Exhibit F** is a true and correct copy of excerpts of Doe 9’s Interrogatory Answers.

4. Defendants have been attempting to obtain information concerning Plaintiffs’ mental and emotional distress claims for several years. Defendants initially requested that Plaintiffs consent to IMEs in October 2021, but they refused to do so. On June 14, 2023, my office sent a detailed letter to Plaintiffs’ counsel, a true and correct copy of which is attached hereto as

Exhibit G. In the letter, we identified a proposed expert, Dr. Janine Shelby, and outlined the parameters of the examination. Subsequently, my office provided to Plaintiffs' counsel a proposed stipulation setting forth specific parameters for the IMEs. We invited Plaintiffs' counsel to provide comments to the proposed stipulation, but they never did so. After several conferences of counsel, the parties came to an agreement to defer the IME issue until after Plaintiffs' depositions had been completed and at that time re-assess whether IMEs were necessary.

5. Between April 11 and 25, 2024, my colleagues Emily Evitt and Marissa Lewis took the depositions of each of the nine Plaintiffs. Attached hereto as **Exhibits H through M** are true and correct copies of excerpts from the transcripts of the Subject Plaintiffs' depositions.¹ Specifically:

- a. Doe 2. Attached hereto as **Exhibit H** is a true and correct copy of excerpts of the transcript from Doe 2's deposition in this action, which was taken on April 18, 2024.
- b. Doe 4. Attached hereto as **Exhibit I** is a true and correct copy of excerpts of the transcript from Doe 4's deposition in this action, which was taken on April 11, 2024.
- c. Doe 5. Attached hereto as **Exhibit J** is a true and correct copy of excerpts of the transcript from Doe 5's deposition in this action, which was taken on April 12, 2024.
- d. Doe 6. Attached hereto as **Exhibit K** is a true and correct copy of excerpts of the transcript from Doe 6's deposition in this action, which was taken on April 15, 2024.
- e. Doe 7. Attached hereto as **Exhibit L** is a true and correct copy of excerpts of the transcript from Doe 7's deposition in this action, which was taken on April 17, 2024.

¹ Plaintiffs have designated their deposition transcripts as confidential. Accordingly, Defendants have filed Exhibits H through M under seal, and have contemporaneously filed a Motion to Seal with the Court.

- f. Doe 9. Attached hereto as **Exhibit M** is a true and correct copy of excerpts of the transcript from Doe 9's deposition in this action, which was taken on April 19, 2024.

6. Immediately following Plaintiffs' depositions, Defendants reviewed each of the Plaintiffs' deposition testimony and re-assessed the need for an IME. On May 1, 2024, Defendants contacted Plaintiffs' counsel to request that the six Subject Plaintiffs (Does 2, 4, 5, 6, 7, and 9) stipulate to an IME conducted by Dr. Shelby and provided an updated proposed stipulation setting forth the parameters of the examination. Plaintiffs did not respond to Defendants' request or propose any modifications to the proposed parameters.

7. On May 9, 2024, I, along with my colleagues Marissa Lewis and Emily Evitt, held a meeting with Plaintiff's counsel to discuss whether Plaintiffs would consent to IMEs of the six Subject Plaintiffs. During that conference, Plaintiffs' counsel agreed that an IME was appropriate for two of the Subject Plaintiffs (Does 6 and 9), but refused to stipulate to an examination of the other four Subject Plaintiffs (Does 2, 4, 5, and 7). Moreover, with respect to Does 6 and 9, Plaintiffs' counsel stated that they would only agree to the examination if: (1) Dr. Shelby's examination is confined to a set of specific, limited, pre-defined protocols that Plaintiffs' counsel have never provided; (2) another person is present during the examination; and (3) there is a strict time limit imposed. With respect to the time limit, Plaintiffs have never definitively proposed the number of hours, but rejected Dr. Shelby's proposal of approximately eight hours, and have demanded that the IME be significantly shorter. Plaintiffs' counsel advised us that they would not entertain a compromise on any of these issues.

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8. Attached hereto as **Exhibit N** is a true and correct copy of a report by Plaintiffs' proffered expert, Peter Collins, "a physician ... specializing in Forensic Psychiatry," discussing the Subject Plaintiffs' mental conditions.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 30th day of May, 2024 at Los Angeles, California.



Marc E. Mayer

Exhibit A

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,

Defendants.

CASE NO. 7:20-CV-00947-TMC

**ANSWERS OF JANE DOE 2 TO
DEFENDANT MG FREESITES, LTD.'S
FIRST SET OF INTERROGATORIES**

PROPOUNDING PARTY: Defendant MG Freesites, Ltd.

RESPONDING PARTY: Plaintiff Jane Doe 2

SET NUMBER: One (1)

COMES NOW **JANE DOE 2**, a Plaintiff in the above-titled action, and hereby serves her Answers to this first set of Interrogatories propounded by Defendant, MG Freesites, Ltd., and served upon Defendant's attorneys via USPS and electronic mail, Attn: Taylor Speer, PO Box 1509 | Greenville, SC 29602, tspeer@turnerpadget.com.

INTERROGATORIES

INTERROGATORY NO. 1:

State YOUR full name, address, and any email addresses or online handles YOU have used over the past 5 years.

1. ANSWER:

[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

INTERROGATORY NO. 2:

IDENTIFY all URLs or online locations where YOU contend the VIDEOS have appeared, including but not limited to any URLs or online locations on any website owned or controlled by Defendant.

ANSWER: Plaintiff does not know all the URLs or online locations where the videos have appeared. The videos keep cropping up in different places. Additionally, Plaintiff does not know all the websites owned or controlled by the Defendant. The URLs and websites which the Plaintiff is aware of at present, where the videos, or still images from them, were found are as follows:

- https://Pornhub.com/view_video.php?viewkey=ph5d6f817008bfb
- <https://www.pornhub.com/model/lordfauger18>
- <https://fap18.net/video/65729562/lockerroom-spy-cam-2>
- <https://pj222.top/videos/frente-a-su-novio-11831022>
- <https://xmobi.pro/xh5264695.html>
- <https://pj222.top/videos/frente-a-su-novio-11831022>
- <https://xmobi.pro/xh5264695.html>
- <https://xhamster.adultiq.club/videos/spring-break-college-girl-shower-window-spy-10257637>

- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://xmobi.pro/xh12954667.html>
- <http://adultjoy.net/movies/12327800/sexy-ebony-teen-in-bathroom-hidden-cam-clip>
- <http://adultjoy.net/movies/12947334/webslut-claire-k-amazing-tits>
- <https://thumb-v-cl2.xhcdn.com/a/npJjnc81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
- <https://mp4porn.space/video/hidden+locker+7+12197038>.
- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://xhamster.com/videos/hidden-locker-8-12197039>
- <https://xhamster.com/videos/hidden-locker-7-12197038>
- <https://www.faptube.xyz/media/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xmobi.pro/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://xmobi.pro/xh13115477.html>
- <http://adultjoy.net/movies/12197038/hidden-locker-7>
- <http://adultjoy.net/movies/12197039/hidden-locker-8>
- <http://www.hothomemade.com/video/156842/hidden-locker-7>
- <https://xhamster.one/videos/hidden-locker-7-12197038>
- <https://pimpandhost.com/image/121833006>
- <https://pimpandhost.com/image/121833011>
- <https://xhamster.com/videos/hidden-locker-1-12197032>
- <https://xhamster.com/videos/hidden-locker-2-12197034>

- <https://xhamster.com/videos/hidden-locker-4-12197033>
- <https://xhamster.com/videos/hidden-locker-5-12197036>
- <https://xhamster.com/videos/hidden-locker-6-12197037>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xhamster.com/videos/hidden-locker-7-12197038>
- <https://xhamster.com/videos/hidden-locker-8-12197039>
- <https://xhamster.sitescrack.site/videos/hidden-locker-7-12197038>
- <https://xhamster.sitescrack.site/videos/hidden-locker-8-12197039>
- <https://xhamster.one/videos/hidden-locker-7-12197038>
- <https://xhamster.one/videos/hidden-locker-8-12197039>
- <http://www.hothomemade.com/video/156842/hidden-locker-7>
- <http://adultjoy.net/movies/12197039/hidden-locker-8>
- <http://adultjoy.net/movies/12197038/hidden-locker-7>
- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://thumb-v-cl2.xhcdn.com/a/1zoLtReKuaQz0aVop2D2nw/012/197/039/240x135.4.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/shaFMZwexqjo7F3cp3b8kw/012/197/039/240x135.3.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/npJjinq81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/3brY02A1TCInjq1HxSuUJg/012/197/039/240x135.7.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/ljFIE-3uuY1UOQ0XU3rvvA/012/197/039/240x135.8.jpg>

- <https://thumb-cl2.xhcdn.com/a/E4h67bz1NAOlGExiQofBqg/012/197/039/240x135.9.jpg>
- https://thumb-cl2.xhcdn.com/a/s_7mV6KFyL4hZDAIHsWmAQ/012/197/038/2000x2000.1.jpg
- http://thumb-v8.xhcdn.com/a/Zab_08QnyZHe4POIzYHwXg/012/197/038/320x240.1.jpg
- <https://thumb-cl2.xhcdn.com/a/6lu4f1CDnvnrbhVsTSRKdQ/012/197/038/240x135.1.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/XKzG14sdMCnjvueR09-Qyg/012/197/038/1280x720.1.jpg>
- <http://img.ohcdn.top/i/6434/2332.jpg>
- https://10438-13.s.cdn13.com/contents/videos_screenshots/15000/15421/preview.jpg
- <https://im0-tub-com.yandex.net/i?id=efe0e38c37e0d5311c425f6698f76627&n=13&exp=1>
- <https://im0-tub-com.yandex.net/i?id=1ed2e4485aa76b720b069ea36bd16177&n=16>
- <https://im0-tub-com.yandex.net/i?id=e0ad19799f7766c7c75223faac778426&n=16>
- <https://pimpandhost.com/image/121833011>
- <https://pimpandhost.com/image/121833006>
- <https://xhamster.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <https://xhamster1.desi/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <https://xhamster7.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <http://adultjoy.net/movies/xhdoqGX/voyeur-from-sports-team-locker-room-full-of-shy-teens>
- <http://www.tube3.com/search-voyeur%20from%20sports%20team/1.html>
- <http://voyeurteen.hteenz.com/dtr/link.php?gr=2&id=591e7f&url=nUE0pQbiY3MirJI1paEyMJ4hnUEyMJ56YzAioF94YaObpQ9jLKEbCJIUnTgvZ0MVI0L1ATSQA>

GWuI1WfLax5ARjmnT9nEmy4HwSaCFMwLKD9qz95MKIHK3EyMJ4zMQ1JoG
x1JyuJrHyUJayvZwOaLmAPqzAhHacWFSWfJIpjM2WUBJcuZyM5FHuXqzVIZ
TqnovMmLxAPqyccDacuFTgaMRqJoTWhGzIBIT94G1R9CD==

- <http://www.foxporn.com/straight-video-48051642.html?track=33842208404591109753233231121821878>
- <https://mofosex.net/play/KTiRiQ6ebbk/voyeur-from-sports-team-locker-room-full-of-shy-teens/>
- <http://livehomemade.com/voyeur-from-sports-team-locker-room-full-of-shy-teens-3868020.html>
- <http://www.paradisenukes.com/click/4-98/video/voyeur-from-sports-team-locker-room-full-of-shy-teens-8wgXXGnXE3y.html>

These URLs represent only instances of which Plaintiff has become aware. They are almost certainly not the only URLs where the videos, or images from them, have appeared and as Discovery is still ongoing, Plaintiff reserves the right to supplement this answer.

INTERROGATORY NO. 3:

State each category of damages that YOU claim to have suffered in connection with the facts that give rise to the ACTION and the amount of such damages.

ANSWER: Plaintiff has suffered injury to her reputation, humiliation, embarrassment, along with accompanying mental and psychological damage. Money was made from Plaintiff's image without her consent. The actual dollar amount of these damages will be presented to a jury for determination. Discovery is still ongoing, Plaintiff reserves the right to supplement this answer as information becomes available.

INTERROGATORY NO. 4:

For each claim of damages set forth in the immediately preceding interrogatory, state the manner by which YOU calculated such damages.

ANSWER: Plaintiff has not calculated a dollar amount at this time.

INTERROGATORY NO. 5:

For each claim of damages set forth in the immediately preceding interrogatory, identify all DOCUMENTS that support your damages claim.

ANSWER: Plaintiff has no documents in her possession responsive to this Interrogatory at this time.

INTERROGATORY NO. 6:

State all facts that support any claim by YOU that MURPHY and DEFENDANT conspired in connection with any of the facts alleged in this ACTION.

ANSWER: Plaintiff relies upon the facts contained within her Fourth Amended Complaint. Plaintiff cannot state “all facts” at this time. Plaintiff is not a lawyer and cannot provide a legal description of what constitutes a ‘conspiracy’ as a matter of law, but it is the Plaintiff’s contention that Murphy and the Defendant agreed or worked together, explicitly or implicitly, in creating and distributing the videos; that Murphy recorded the videos with the expectation of gain and that Defendant intentionally and knowingly solicited or encouraged Murphy’s expectation and/or actually provided some gain to Murphy with the common goal of profiting from the exploitation of the illicit videos.

INTERROGATORY NO. 7:

State all facts relating to when and how YOU first became aware of or discovered the VIDEOS.

ANSWER: Plaintiff cannot determine “all facts relating to” this event. The question is too broad. But on Friday, October 18, 2019 Plaintiff received an email from Scott Wiegandt, the Bellarmine University Athletic Director, informing me that there was an incident that

Exhibit B

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,

Defendants.

CASE NO. 7:20-CV-00947-TMC

**ANSWERS OF JANE DOE 4 TO
DEFENDANT MG FREESITES, LTD.'S
FIRST SET OF INTERROGATORIES**

PROPOUNDING PARTY: Defendant MG Freesites, Ltd.

RESPONDING PARTY: Plaintiff Jane Doe 4

SET NUMBER: One (1)

COMES NOW **JANE DOE 4**, a Plaintiff in the above-titled action, and hereby serves her Answers to this first set of Interrogatories propounded by Defendant, MG Freesites, Ltd., and served upon Defendant's attorneys via USPS and electronic mail, Attn: Taylor Speer, PO Box 1509 | Greenville, SC 29602, tspeer@turnerpadget.com.

INTERROGATORIES

INTERROGATORY NO. 1:

State YOUR full name, address, and any email addresses or online handles YOU have used over the past 5 years.

ANSWER:

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

INTERROGATORY NO. 2:

IDENTIFY all URLs or online locations where YOU contend the VIDEOS have appeared, including but not limited to any URLs or online locations on any website owned or controlled by Defendant.

ANSWER: Plaintiff does not know all the URLs or online locations where the videos have appeared. The videos keep cropping up in different places. Additionally, Plaintiff does not know all the websites owned or controlled by the Defendant. The URLs and websites which the Plaintiff is aware of at present, where the videos, or still images from them, were found are as follows:

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- <https://www.pornhub.com/model/lordfauger18>
- <https://fap18.net/video/65729562/lockerroom-spy-cam-2>
- <https://pj222.top/videos/frente-a-su-novio-11831022>
- <https://xmobi.pro/xh5264695.html>
- <https://pj222.top/videos/frente-a-su-novio-11831022>
- <https://xmobi.pro/xh5264695.html>
- <https://xhamster.adultiq.club/videos/spring-break-college-girl-shower-window-spy-10257637>
- <https://mp4porn.space/video/hidden+locker+8+12197039>

- <https://xmobi.pro/xh12954667.html>
- <http://adultjoy.net/movies/12327800/sexy-ebony-teen-in-bathroom-hidden-cam-clip>
- <http://adultjoy.net/movies/12947334/webslut-claire-k-amazing-tits>
- <https://thumb-v-cl2.xhcdn.com/a/npJjnq81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
- <https://mp4porn.space/video/hidden+locker+7+12197038>.
- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://xhamster.com/videos/hidden-locker-8-12197039>
- <https://xhamster.com/videos/hidden-locker-7-12197038>
- <https://www.faptube.xyz/media/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xmobi.pro/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://xmobi.pro/xh13115477.html>
- <http://adultjoy.net/movies/12197038/hidden-locker-7>
- <http://adultjoy.net/movies/12197039/hidden-locker-8>
- <http://www.hothomemade.com/video/156842/hidden-locker-7>
- <https://xhamster.one/videos/hidden-locker-7-12197038>
- <https://pimpandhost.com/image/121833006>
- <https://pimpandhost.com/image/121833011>
- <https://xhamster.com/videos/hidden-locker-1-12197032>
- <https://xhamster.com/videos/hidden-locker-2-12197034>
- <https://xhamster.com/videos/hidden-locker-4-12197033>

- <https://xhamster.com/videos/hidden-locker-5-12197036>
- <https://xhamster.com/videos/hidden-locker-6-12197037>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xhamster.com/videos/hidden-locker-7-12197038>
- <https://xhamster.com/videos/hidden-locker-8-12197039>
- <https://xhamster.sitescrack.site/videos/hidden-locker-7-12197038>
- <https://xhamster.sitescrack.site/videos/hidden-locker-8-12197039>
- <https://xhamster.one/videos/hidden-locker-7-12197038>
- <https://xhamster.one/videos/hidden-locker-8-12197039>
- <http://www.hothomemade.com/video/156842/hidden-locker-7>
- <http://adultjoy.net/movies/12197039/hidden-locker-8>
- <http://adultjoy.net/movies/12197038/hidden-locker-7>
- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://thumb-v-cl2.xhcdn.com/a/1zoLtReKuaQz0aVop2D2nw/012/197/039/240x135.4.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/shaFMZwexqjo7F3cp3b8kw/012/197/039/240x135.3.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/npJjnc81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/3brY02A1TCInjq1HxSuUJg/012/197/039/240x135.7.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/ljFIE-3uuY1UOQ0XU3ryvA/012/197/039/240x135.8.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/E4h67bz1NAOlGExiQofBqg/012/197/039/240x135.9.jpg>

- https://thumb-v-cl2.xhcdn.com/a/s_7mV6KFvL4hZDAIHSwmAQ/012/197/038/2000x2000.1.jpg
- http://thumb-v8.xhcdn.com/a/Zab_08QnyZHe4POIzYHwXg/012/197/038/320x240.1.jpg
- <https://thumb-v-cl2.xhcdn.com/a/6lu4f1CDnvnrbhVsTSRKdQ/012/197/038/240x135.1.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/XKzG14sdMCnjvueR09-Qyg/012/197/038/1280x720.1.jpg>
- <http://img.ohcdn.top/i/6434/2332.jpg>
- https://10438-13.s.cdn13.com/contents/videos_screenshots/15000/15421/preview.jpg
- <https://im0-tub-com.yandex.net/i?id=efe0e38c37e0d5311c425f6698f76627&n=13&exp=1>
- <https://im0-tub-com.yandex.net/i?id=1ed2e4485aa76b720b069ea36bd16177&n=16>
- <https://im0-tub-com.yandex.net/i?id=e0ad19799f7766c7c75223faac778426&n=16>
- <https://pimpandhost.com/image/121833011>
- <https://pimpandhost.com/image/121833006>
- <https://xhamster.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <https://xhamster1.desi/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <https://xhamster7.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <http://adultjoy.net/movies/xhdoqGX/voyeur-from-sports-team-locker-room-full-of-shy-teens>
- <http://www.tube3.com/search-voyeur%20from%20sports%20team/1.html>
- <http://voyeurteen.hteenz.com/dtr/link.php?gr=2&id=591e7f&url=nUE0pQbiY3MirJI1paEyMJ4hnUEyMJ56YzAioF94YaObpQ9jLKEbCJIUnTgvZ0MVI0L1ATSQAGWuI1WfLax5ARjmnT9nEmy4HwSaCFMwLKD9qz95MKIHK3EyMJ4zMq1JoGx1JyuJrHyUJayvZwOaLmAPqzAhHacWFSWfJIpjM2WUBJcuZyM5FHuXqzVIZ>

TqnoyMmLxAPqyccDacuFTgaMRqJoTWhGzIBIT94G1R9CD==

- <http://www.foxporn.com/straight-video-48051642.html?track=33842208404591109753233231121821878>
- <https://mofosex.net/play/KTiRiQ6ebbk/voyeur-from-sports-team-locker-room-full-of-shy-teens/>
- <http://livehomemade.com/voyeur-from-sports-team-locker-room-full-of-shy-teens-3868020.html>
- <http://www.paradisenukes.com/click/4-98/video/voyeur-from-sports-team-locker-room-full-of-shy-teens-8wgXXGnXE3y.html>

These URLs represent only instances of which Plaintiff has become aware. They are almost certainly not the only URLs where the videos, or images from them, have appeared and as Discovery is still ongoing, Plaintiff reserves the right to supplement this answer.

INTERROGATORY NO. 3:

State each category of damages that YOU claim to have suffered in connection with the facts that give rise to the ACTION and the amount of such damages.

ANSWER: Plaintiff has suffered injury to her reputation, humiliation, embarrassment, along with accompanying mental and psychological damage. Money was made from Plaintiff's image without her consent. The actual dollar amount of these damages will be presented to a jury for determination. Discovery is still ongoing, Plaintiff reserves the right to supplement this answer as information becomes available.

INTERROGATORY NO. 4:

For each claim of damages set forth in the immediately preceding interrogatory, state the manner by which YOU calculated such damages.

ANSWER: Plaintiff has not calculated a dollar amount at this time.

INTERROGATORY NO. 5:

For each claim of damages set forth in the immediately preceding interrogatory, identify all DOCUMENTS that support your damages claim.

ANSWER: Plaintiff has no documents in her possession responsive to this Interrogatory at this time.

INTERROGATORY NO. 6:

State all facts that support any claim by YOU that MURPHY and DEFENDANT conspired in connection with any of the facts alleged in this ACTION.

ANSWER: Plaintiff relies upon the facts contained within her Fourth Amended Complaint. Plaintiff cannot state “all facts” at this time. Plaintiff is not a lawyer and cannot provide a legal description of what constitutes a ‘conspiracy’ as a matter of law, but it is the Plaintiff’s contention that Murphy and the Defendant agreed or worked together, explicitly or implicitly, in creating and distributing the videos; that Murphy recorded the videos with the expectation of gain and that Defendant intentionally and knowingly solicited or encouraged Murphy’s expectation and/or actually provided some gain to Murphy with the common goal of profiting from the exploitation of the illicit videos.

INTERROGATORY NO. 7:

State all facts relating to when and how YOU first became aware of or discovered the VIDEOS.

ANSWER: Plaintiff cannot determine “all facts relating to” this event. The question is too broad. Plaintiff was first told that I may be involved in this in October of 2019. I found out I was for sure a part of the video (because I saw it myself) within 24 hours of being notified.

Exhibit C

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,

Defendants.

CASE NO. 7:20-CV-00947-TMC

**ANSWERS OF JANE DOE 5 TO
DEFENDANT MG FREESITES, LTD.'S
FIRST SET OF INTERROGATORIES**

PROPOUNDING PARTY: Defendant MG Freesites, Ltd.

RESPONDING PARTY: Plaintiff Jane Doe 5

SET NUMBER: One (1)

COMES NOW **JANE DOE 5**, a Plaintiff in the above-titled action, and hereby serves her Answers to this first set of Interrogatories propounded by Defendant, MG Freesites, Ltd., and served upon Defendant's attorneys via USPS and electronic mail, Attn: Taylor Speer, PO Box 1509 | Greenville, SC 29602, tspeer@turnerpadget.com.

INTERROGATORIES

INTERROGATORY NO. 1:

State YOUR full name, address, and any email addresses or online handles YOU have used over the past 5 years.

1) ANSWER:

[REDACTED]

INTERROGATORY NO. 2:

IDENTIFY all URLs or online locations where YOU contend the VIDEOS have appeared, including but not limited to any URLs or online locations on any website owned or controlled by Defendant.

ANSWER: Plaintiff does not know all the URLs or online locations where the videos have appeared. The videos keep cropping up in different places. Additionally, Plaintiff does not know all the websites owned or controlled by the Defendant. The URLs and websites which the Plaintiff is aware of at present, where the videos, or still images from them, were found are as follows:

- https://Pornhub.com/view_video.php?viewkey=ph5d6f817008bfb
- <https://www.pornhub.com/model/lordfauger18>
- <https://fap18.net/video/65729562/lockerroom-spy-cam-2>
- <https://pj222.top/videos/frente-a-su-novio-11831022>
- <https://xmobi.pro/xh5264695.html>
- <https://pj222.top/videos/frente-a-su-novio-11831022>

- <https://xmobi.pro/xh5264695.html>
- <https://xhamster.adultiq.club/videos/spring-break-college-girl-shower-window-spy-10257637>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://xmobi.pro/xh12954667.html>
- <http://adultjoy.net/movies/12327800/sexy-ebony-teen-in-bathroom-hidden-cam-clip>
- <http://adultjoy.net/movies/12947334/webslut-claire-k-amazing-tits>
- <https://thumb-v-cl2.xhcdn.com/a/npJjnc81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
- <https://mp4porn.space/video/hidden+locker+7+12197038>.
- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://xhamster.com/videos/hidden-locker-8-12197039>
- <https://xhamster.com/videos/hidden-locker-7-12197038>
- <https://www.faptube.xyz/media/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xmobi.pro/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://xmobi.pro/xh13115477.html>
- <http://adultjoy.net/movies/12197038/hidden-locker-7>
- <http://adultjoy.net/movies/12197039/hidden-locker-8>
- <http://www.hothomemade.com/video/156842/hidden-locker-7>
- <https://xhamster.one/videos/hidden-locker-7-12197038>
- <https://pimpandhost.com/image/121833006>
- <https://pimpandhost.com/image/121833011>

- <https://xhamster.com/videos/hidden-locker-1-12197032>
- <https://xhamster.com/videos/hidden-locker-2-12197034>
- <https://xhamster.com/videos/hidden-locker-4-12197033>
- <https://xhamster.com/videos/hidden-locker-5-12197036>
- <https://xhamster.com/videos/hidden-locker-6-12197037>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xhamster.com/videos/hidden-locker-7-12197038>
- <https://xhamster.com/videos/hidden-locker-8-12197039>
- <https://xhamster.sitescrack.site/videos/hidden-locker-7-12197038>
- <https://xhamster.sitescrack.site/videos/hidden-locker-8-12197039>
- <https://xhamster.one/videos/hidden-locker-7-12197038>
- <https://xhamster.one/videos/hidden-locker-8-12197039>
- <http://www.hothomemade.com/video/156842/hidden-locker-7>
- <http://adultjoy.net/movies/12197039/hidden-locker-8>
- <http://adultjoy.net/movies/12197038/hidden-locker-7>
- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://thumb-v-cl2.xhcdn.com/a/1zoLtReKuaQz0aVop2D2nw/012/197/039/240x135.4.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/shaFMZwexqjo7F3cp3b8kw/012/197/039/240x135.3.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/npJjng81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/3brY02A1TCInjq1HxSuUJg/012/197/039/240x135.7.jpg>

- <https://thumb-v-cl2.xhcdn.com/a/ljFIE-3uuY1UOQ0XU3rvvA/012/197/039/240x135.8.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/E4h67bz1NAOlGExiQofBqg/012/197/039/240x135.9.jpg>
- https://thumb-v-cl2.xhcdn.com/a/s_7mV6KFyL4hZDAIHsWmAQ/012/197/038/2000x2000.1.jpg
- http://thumb-v8.xhcdn.com/a/Zab_08QnyZHe4POIzYHwXg/012/197/038/320x240.1.jpg
- <https://thumb-v-cl2.xhcdn.com/a/6lu4f1CDnvnrbhVsTSRKdQ/012/197/038/240x135.1.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/XKzG14sdMCnjyueR09-Qyg/012/197/038/1280x720.1.jpg>
- <http://img.ohcdn.top/i/6434/2332.jpg>
- https://10438-13.s.cdn13.com/contents/videos_screenshots/15000/15421/preview.jpg
- <https://im0-tub-com.yandex.net/i?id=efe0e38c37e0d5311c425f6698f76627&n=13&exp=1>
- <https://im0-tub-com.yandex.net/i?id=1ed2e4485aa76b720b069ea36bd16177&n=16>
- <https://im0-tub-com.yandex.net/i?id=e0ad19799f7766c7c75223faac778426&n=16>
- <https://pimpandhost.com/image/121833011>
- <https://pimpandhost.com/image/121833006>
- <https://xhamster.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <https://xhamster1.desi/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <https://xhamster7.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <http://adultjoy.net/movies/xhdoqGX/voyeur-from-sports-team-locker-room-full-of-shy-teens>
- <http://www.tube3.com/search-voyeur%20from%20sports%20team/1.html>

- <http://voyeurteen.hteenz.com/dtr/link.php?gr=2&id=591e7f&url=nUE0pQbiY3MirJI1paEvMJ4hnUEvMJ56YzAioF94YaObpQ9jLKEbCJIUnTgvZ0MVI0L1ATSQAGWuI1WfLax5ARjmnT9nEmy4HwSaCFMwLKD9qz95MKIHK3EyMJ4zMq1JoGx1JyuJrHyUJayvZwOaLmAPqzAhHacWFSWfJIpiM2WUBJcuZyM5FHuXqzVIZTqnoyMmLxAPqvccDacuFTgaMRqJoTWhGzIBIT94G1R9CD==>
- <http://www.foxporn.com/straight-video-48051642.html?track=33842208404591109753233231121821878>
- <https://mofosex.net/play/KTiRiQ6ebbk/voyeur-from-sports-team-locker-room-full-of-shy-teens/>
- <http://livehomemade.com/voyeur-from-sports-team-locker-room-full-of-shy-teens-3868020.html>
- <http://www.paradisenu.com/click/4-98/video/voyeur-from-sports-team-locker-room-full-of-shy-teens-8wgXXGnXE3v.html>

These URLs represent only instances of which Plaintiff has become aware. They are almost certainly not the only URLs where the videos, or images from them, have appeared and as Discovery is still ongoing, Plaintiff reserves the right to supplement this answer.

INTERROGATORY NO. 3:

State each category of damages that YOU claim to have suffered in connection with the facts that give rise to the ACTION and the amount of such damages.

ANSWER: Plaintiff has suffered injury to her reputation, humiliation, embarrassment, along with accompanying mental and psychological damage. Money was made from Plaintiff's image without her consent. The actual dollar amount of these damages will be presented to a jury for determination. Discovery is still ongoing, Plaintiff reserves the right to supplement this answer as information becomes available.

INTERROGATORY NO. 4:

For each claim of damages set forth in the immediately preceding interrogatory, state the manner by which YOU calculated such damages.

ANSWER: Plaintiff has not calculated a dollar amount at this time.

INTERROGATORY NO. 5:

For each claim of damages set forth in the immediately preceding interrogatory, identify all DOCUMENTS that support your damages claim.

ANSWER: Plaintiff has no documents in her possession responsive to this Interrogatory at this time.

INTERROGATORY NO. 6:

State all facts that support any claim by YOU that MURPHY and DEFENDANT conspired in connection with any of the facts alleged in this ACTION.

ANSWER: Plaintiff relies upon the facts contained within her Fourth Amended Complaint. Plaintiff cannot state “all facts” at this time. Plaintiff is not a lawyer and cannot provide a legal description of what constitutes a ‘conspiracy’ as a matter of law, but it is the Plaintiff’s contention that Murphy and the Defendant agreed or worked together, explicitly or implicitly, in creating and distributing the videos; that Murphy recorded the videos with the expectation of gain and that Defendant intentionally and knowingly solicited or encouraged Murphy’s expectation and/or actually provided some gain to Murphy with the common goal of profiting from the exploitation of the illicit videos.

Exhibit D

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,

Defendants.

CASE NO. 7:20-CV-00947-TMC

**ANSWERS OF JANE DOE 6 TO
DEFENDANT MG FREESITES, LTD.'S
FIRST SET OF INTERROGATORIES**

PROPOUNDING PARTY: Defendant MG Freesites, Ltd.

RESPONDING PARTY: Plaintiff Jane Doe 6

SET NUMBER: One (1)

COMES NOW **JANE DOE 6**, a Plaintiff in the above-titled action, and hereby serves her Answers to this first set of Interrogatories propounded by Defendant, MG Freesites, Ltd., and served upon Defendant's attorneys via USPS and electronic mail, Attn: Taylor Speer, PO Box 1509 | Greenville, SC 29602, tspeer@turnerpadget.com.

INTERROGATORIES

INTERROGATORY NO. 1:

State YOUR full name, address, and any email addresses or online handles YOU have used over the past 5 years.

ANSWER:

████████████████████
████████████████████

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

INTERROGATORY NO. 2:

IDENTIFY all URLs or online locations where YOU contend the VIDEOS have appeared, including but not limited to any URLs or online locations on any website owned or controlled by Defendant.

ANSWER: Plaintiff does not know all the URLs or online locations where the videos have appeared. The videos keep cropping up in different places. Additionally, Plaintiff does not know all the websites owned or controlled by the Defendant. The URLs and websites which the Plaintiff is aware of at present, where the videos, or still images from them, were found are as follows:

- https://Pornhub.com/view_video.php?viewkey=ph5d6f817008bfb
- <https://www.pornhub.com/model/lordfauger18>
- <https://fap18.net/video/65729562/lockerroom-spy-cam-2>
- <https://pj222.top/videos/frente-a-su-novio-11831022>
- <https://xmobi.pro/xh5264695.html>
- <https://pj222.top/videos/frente-a-su-novio-11831022>
- <https://xmobi.pro/xh5264695.html>
- <https://xhamster.adultiq.club/videos/spring-break-college-girl-shower-window-spy-10257637>
- <https://mp4porn.space/video/hidden+locker+8+12197039>

- <https://xmobi.pro/xh12954667.html>
- <http://adultjoy.net/movies/12327800/sexy-ebony-teen-in-bathroom-hidden-cam-clip>
- <http://adultjoy.net/movies/12947334/webslut-claire-k-amazing-tits>
- <https://thumb-v-cl2.xhcdn.com/a/npJjnq81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
- <https://mp4porn.space/video/hidden+locker+7+12197038>.
- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://xhamster.com/videos/hidden-locker-8-12197039>
- <https://xhamster.com/videos/hidden-locker-7-12197038>
- <https://www.faptube.xyz/media/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xmobi.pro/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://xmobi.pro/xh13115477.html>
- <http://adultjoy.net/movies/12197038/hidden-locker-7>
- <http://adultjoy.net/movies/12197039/hidden-locker-8>
- <http://www.hothomemade.com/video/156842/hidden-locker-7>
- <https://xhamster.one/videos/hidden-locker-7-12197038>
- <https://pimpandhost.com/image/121833006>
- <https://pimpandhost.com/image/121833011>
- <https://xhamster.com/videos/hidden-locker-1-12197032>
- <https://xhamster.com/videos/hidden-locker-2-12197034>
- <https://xhamster.com/videos/hidden-locker-4-12197033>

- <https://xhamster.com/videos/hidden-locker-5-12197036>
- <https://xhamster.com/videos/hidden-locker-6-12197037>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xhamster.com/videos/hidden-locker-7-12197038>
- <https://xhamster.com/videos/hidden-locker-8-12197039>
- <https://xhamster.sitescrack.site/videos/hidden-locker-7-12197038>
- <https://xhamster.sitescrack.site/videos/hidden-locker-8-12197039>
- <https://xhamster.one/videos/hidden-locker-7-12197038>
- <https://xhamster.one/videos/hidden-locker-8-12197039>
- <http://www.hothomemade.com/video/156842/hidden-locker-7>
- <http://adultjoy.net/movies/12197039/hidden-locker-8>
- <http://adultjoy.net/movies/12197038/hidden-locker-7>
- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://thumb-v-cl2.xhcdn.com/a/1zoLtReKuaQz0aVop2D2nw/012/197/039/240x135.4.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/shaFMZwexqjo7F3cp3b8kw/012/197/039/240x135.3.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/npJjnc81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/3brY02A1TCInjq1HxSuUJg/012/197/039/240x135.7.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/ljFIE-3uuY1UOQ0XU3ryvA/012/197/039/240x135.8.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/E4h67bz1NAOlGExiQofBqg/012/197/039/240x135.9.jpg>

- https://thumb-v-cl2.xhcdn.com/a/s_7mV6KFvL4hZDAIHsWmAQ/012/197/038/2000x2000.1.jpg
- http://thumb-v8.xhcdn.com/a/Zab_08QnyZHe4POIzYHwXg/012/197/038/320x240.1.jpg
- <https://thumb-v-cl2.xhcdn.com/a/6lu4f1CDnvnrbhVsTSRKdQ/012/197/038/240x135.1.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/XKzG14sdMCnjvueR09-Qyg/012/197/038/1280x720.1.jpg>
- <http://img.ohcdn.top/i/6434/2332.jpg>
- https://10438-13.s.cdn13.com/contents/videos_screenshots/15000/15421/preview.jpg
- <https://im0-tub-com.yandex.net/i?id=efe0e38c37e0d5311c425f6698f76627&n=13&exp=1>
- <https://im0-tub-com.yandex.net/i?id=1ed2e4485aa76b720b069ea36bd16177&n=16>
- <https://im0-tub-com.yandex.net/i?id=e0ad19799f7766c7c75223faac778426&n=16>
- <https://pimpandhost.com/image/121833011>
- <https://pimpandhost.com/image/121833006>
- <https://xhamster.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <https://xhamster1.desi/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <https://xhamster7.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <http://adultjoy.net/movies/xhdoqGX/voyeur-from-sports-team-locker-room-full-of-shy-teens>
- <http://www.tube3.com/search-voyeur%20from%20sports%20team/1.html>
- <http://voyeurteen.hteenz.com/dtr/link.php?gr=2&id=591e7f&url=nUE0pQbiY3MirJI1paEyMJ4hnUEyMJ56YzAioF94YaObpQ9jLKEbCJIUnTgvZ0MVI0L1ATSQAGWuI1WfLax5ARjmnT9nEmy4HwSaCFMwLKD9qz95MKIHK3EyMJ4zMq1JoGx1JyuJrHyUJayvZwOaLmAPqzAhHacWFSWfJIpjM2WUBJcuZyM5FHuXqzVIZ>

TqnoyMmLxAPqyccDacuFTgaMRqJoTWhGzIBIT94G1R9CD==

- <http://www.foxporn.com/straight-video-48051642.html?track=33842208404591109753233231121821878>
- <https://mofosex.net/play/KTiRiQ6ebbk/voyeur-from-sports-team-locker-room-full-of-shy-teens/>
- <http://livehomemade.com/voyeur-from-sports-team-locker-room-full-of-shy-teens-3868020.html>
- <http://www.paradisenukes.com/click/4-98/video/voyeur-from-sports-team-locker-room-full-of-shy-teens-8wgXXGnXE3y.html>

These URLs represent only instances of which Plaintiff has become aware. They are almost certainly not the only URLs where the videos, or images from them, have appeared and as Discovery is still ongoing, Plaintiff reserves the right to supplement this answer.

INTERROGATORY NO. 3:

State each category of damages that YOU claim to have suffered in connection with the facts that give rise to the ACTION and the amount of such damages.

ANSWER: Plaintiff has suffered injury to her reputation, humiliation, embarrassment, along with accompanying mental and psychological damage. Money was made from Plaintiff's image without her consent. The actual dollar amount of these damages will be presented to a jury for determination. Discovery is still ongoing, Plaintiff reserves the right to supplement this answer as information becomes available.

INTERROGATORY NO. 4:

For each claim of damages set forth in the immediately preceding interrogatory, state the manner by which YOU calculated such damages.

ANSWER: Plaintiff has not calculated a dollar amount at this time.

INTERROGATORY NO. 5:

For each claim of damages set forth in the immediately preceding interrogatory, identify all DOCUMENTS that support your damages claim.

ANSWER: Plaintiff has no documents in her possession responsive to this Interrogatory at this time.

INTERROGATORY NO. 6:

State all facts that support any claim by YOU that MURPHY and DEFENDANT conspired in connection with any of the facts alleged in this ACTION.

ANSWER: Plaintiff relies upon the facts contained within her Fourth Amended Complaint. Plaintiff cannot state “all facts” at this time. Plaintiff is not a lawyer and cannot provide a legal description of what constitutes a ‘conspiracy’ as a matter of law, but it is the Plaintiff’s contention that Murphy and the Defendant agreed or worked together, explicitly or implicitly, in creating and distributing the videos; that Murphy recorded the videos with the expectation of gain and that Defendant intentionally and knowingly solicited or encouraged Murphy’s expectation and/or actually provided some gain to Murphy with the common goal of profiting from the exploitation of the illicit videos.

INTERROGATORY NO. 7:

State all facts relating to when and how YOU first became aware of or discovered the VIDEOS.

Exhibit E

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,

Defendants.

CASE NO. 7:20-CV-00947-TMC

**ANSWERS OF JANE DOE 7 TO
DEFENDANT MG FREESITES, LTD.'S
FIRST SET OF INTERROGATORIES**

PROPOUNDING PARTY: Defendant MG Freesites, Ltd.

RESPONDING PARTY: Plaintiff Jane Doe 7

SET NUMBER: One (1)

COMES NOW **JANE DOE 7**, a Plaintiff in the above-titled action, and hereby serves her Answers to this first set of Interrogatories propounded by Defendant, MG Freesites, Ltd., and served upon Defendant's attorneys via USPS and electronic mail, Attn: Taylor Speer, PO Box 1509 | Greenville, SC 29602, tspeer@turnerpadget.com.

INTERROGATORIES

INTERROGATORY NO. 1:

State YOUR full name, address, and any email addresses or online handles YOU have used over the past 5 years.

ANSWER:

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

INTERROGATORY NO. 2:

IDENTIFY all URLs or online locations where YOU contend the VIDEOS have appeared, including but not limited to any URLs or online locations on any website owned or controlled by Defendant.

ANSWER: Plaintiff does not know all the URLs or online locations where the videos have appeared. The videos keep cropping up in different places. Additionally, Plaintiff does not know all the websites owned or controlled by the Defendant. The URLs and websites which the Plaintiff is aware of at present, where the videos, or still images from them, were found are as follows:

- https://Pornhub.com/view_video.php?viewkey=ph5d6f817008bfb
- <https://www.pornhub.com/model/lordfauger18>
- <https://fap18.net/video/65729562/lockerroom-spy-cam-2>
- <https://pj222.top/videos/frente-a-su-novio-11831022>
- <https://xmobi.pro/xh5264695.html>
- <https://pj222.top/videos/frente-a-su-novio-11831022>

- <https://xmobi.pro/xh5264695.html>
- <https://xhamster.adultiq.club/videos/spring-break-college-girl-shower-window-spy-10257637>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://xmobi.pro/xh12954667.html>
- <http://adultjoy.net/movies/12327800/sexy-ebony-teen-in-bathroom-hidden-cam-clip>
- <http://adultjoy.net/movies/12947334/webslut-claire-k-amazing-tits>
- <https://thumb-v-cl2.xhcdn.com/a/npJjnc81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
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- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://xhamster.com/videos/hidden-locker-8-12197039>
- <https://xhamster.com/videos/hidden-locker-7-12197038>
- <https://www.faptube.xyz/media/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xmobi.pro/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://xmobi.pro/xh13115477.html>
- <http://adultjoy.net/movies/12197038/hidden-locker-7>
- <http://adultjoy.net/movies/12197039/hidden-locker-8>
- <http://www.hothomemade.com/video/156842/hidden-locker-7>
- <https://xhamster.one/videos/hidden-locker-7-12197038>
- <https://pimpandhost.com/image/121833006>
- <https://pimpandhost.com/image/121833011>

- <https://xhamster.com/videos/hidden-locker-1-12197032>
- <https://xhamster.com/videos/hidden-locker-2-12197034>
- <https://xhamster.com/videos/hidden-locker-4-12197033>
- <https://xhamster.com/videos/hidden-locker-5-12197036>
- <https://xhamster.com/videos/hidden-locker-6-12197037>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xhamster.com/videos/hidden-locker-7-12197038>
- <https://xhamster.com/videos/hidden-locker-8-12197039>
- <https://xhamster.sitescrack.site/videos/hidden-locker-7-12197038>
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- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://thumb-v-cl2.xhcdn.com/a/1zoLtReKuaQz0aVop2D2nw/012/197/039/240x135.4.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/shaFMZwexqjo7F3cp3b8kw/012/197/039/240x135.3.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/npJjng81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/3brY02A1TCInjq1HxSuUJg/012/197/039/240x135.7.jpg>

- <https://thumb-v-cl2.xhcdn.com/a/ljFIE-3uuY1UOQ0XU3rvvA/012/197/039/240x135.8.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/E4h67bz1NAOlGExiQofBqg/012/197/039/240x135.9.jpg>
- https://thumb-v-cl2.xhcdn.com/a/s_7mV6KFyL4hZDAIHSwmAQ/012/197/038/2000x2000.1.jpg
- http://thumb-v8.xhcdn.com/a/Zab_08QnyZHe4POIzYHwXg/012/197/038/320x240.1.jpg
- <https://thumb-v-cl2.xhcdn.com/a/6lu4f1CDnvnrbhVsTSRKdQ/012/197/038/240x135.1.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/XKzG14sdMCnjyueR09-Qyg/012/197/038/1280x720.1.jpg>
- <http://img.ohcdn.top/i/6434/2332.jpg>
- https://10438-13.s.cdn13.com/contents/videos_screenshots/15000/15421/preview.jpg
- <https://im0-tub-com.yandex.net/i?id=efe0e38c37e0d5311c425f6698f76627&n=13&exp=1>
- <https://im0-tub-com.yandex.net/i?id=1ed2e4485aa76b720b069ea36bd16177&n=16>
- <https://im0-tub-com.yandex.net/i?id=e0ad19799f7766c7c75223faac778426&n=16>
- <https://pimpandhost.com/image/121833011>
- <https://pimpandhost.com/image/121833006>
- <https://xhamster.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <https://xhamster1.desi/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <https://xhamster7.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
- <http://adultjoy.net/movies/xhdoqGX/voyeur-from-sports-team-locker-room-full-of-shy-teens>
- <http://www.tube3.com/search-voyeur%20from%20sports%20team/1.html>

- <http://voyeurteen.hteenz.com/dtr/link.php?gr=2&id=591e7f&url=nUE0pQbiY3MirJI1paEvMJ4hnUEvMJ56YzAioF94YaObpQ9jLKEbCJIUnTgvZ0MVI0L1ATSQAGWuI1WfLax5ARjmnT9nEmy4HwSaCFMwLKD9qz95MKIHK3EyMJ4zMq1JoGx1JyuJrHyUJayvZwOaLmAPqzAhHacWFSWfJIpiM2WUBJcuZyM5FHuXqzVIZTqnoyMmLxAPqvccDacuFTgaMRqJoTWhGzIBIT94G1R9CD==>
- <http://www.foxporn.com/straight-video-48051642.html?track=33842208404591109753233231121821878>
- <https://mofosex.net/play/KTiRiQ6ebbk/voyeur-from-sports-team-locker-room-full-of-shy-teens/>
- <http://livehomemade.com/voyeur-from-sports-team-locker-room-full-of-shy-teens-3868020.html>
- <http://www.paradisenu.com/click/4-98/video/voyeur-from-sports-team-locker-room-full-of-shy-teens-8wgXXGnXE3v.html>

These URLs represent only instances of which Plaintiff has become aware. They are almost certainly not the only URLs where the videos, or images from them, have appeared and as Discovery is still ongoing, Plaintiff reserves the right to supplement this answer.

INTERROGATORY NO. 3:

State each category of damages that YOU claim to have suffered in connection with the facts that give rise to the ACTION and the amount of such damages.

ANSWER: Plaintiff has suffered injury to her reputation, humiliation, embarrassment, along with accompanying mental and psychological damage. Money was made from Plaintiff's image without her consent. The actual dollar amount of these damages will be presented to a jury for determination. Discovery is still ongoing, Plaintiff reserves the right to supplement this answer as information becomes available.

INTERROGATORY NO. 4:

For each claim of damages set forth in the immediately preceding interrogatory, state the manner by which YOU calculated such damages.

ANSWER: Plaintiff has not calculated a dollar amount at this time. Medical expenses will be determined from the requested records and will be provided when received.

INTERROGATORY NO. 5:

For each claim of damages set forth in the immediately preceding interrogatory, identify all DOCUMENTS that support your damages claim.

ANSWER: Plaintiff's medical records and billings are being requested.

INTERROGATORY NO. 6:

State all facts that support any claim by YOU that MURPHY and DEFENDANT conspired in connection with any of the facts alleged in this ACTION.

INTERROGATORY NO. 6:

State all facts that support any claim by YOU that MURPHY and DEFENDANT conspired in connection with any of the facts alleged in this ACTION.

ANSWER: Plaintiff relies upon the facts contained within her Fourth Amended Complaint. Plaintiff cannot state "all facts" at this time. Plaintiff is not a lawyer and cannot provide a legal description of what constitutes a 'conspiracy' as a matter of law, but it is the Plaintiff's contention that Murphy and the Defendant agreed or worked together, explicitly or implicitly, in creating and distributing the videos; that Murphy recorded the

Exhibit F

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,

Defendants.

CASE NO. 7:20-CV-00947-TMC

**ANSWERS OF JANE DOE 9 TO
DEFENDANT MG FREESITES, LTD.'S
FIRST SET OF INTERROGATORIES**

PROPOUNDING PARTY: Defendant MG Freesites, Ltd.

RESPONDING PARTY: Plaintiff Jane Doe 9

SET NUMBER: One (1)

COMES NOW **JANE DOE 9**, a Plaintiff in the above-titled action, and hereby serves her Answers to this first set of Interrogatories propounded by Defendant, MG Freesites, Ltd., and served upon Defendant's attorneys via USPS and electronic mail, Attn: Taylor Speer, PO Box 1509 | Greenville, SC 29602, tspeer@turnerpadget.com.

INTERROGATORIES

INTERROGATORY NO. 1:

State YOUR full name, address, and any email addresses or online handles YOU have used over the past 5 years.

ANSWER:

[REDACTED]

INTERROGATORY NO. 2:

IDENTIFY all URLs or online locations where YOU contend the VIDEOS have appeared, including but not limited to any URLs or online locations on any website owned or controlled by Defendant.

ANSWER: Plaintiff does not know all the URLs or online locations where the videos have appeared. The videos keep cropping up in different places. Additionally, Plaintiff does not know all the websites owned or controlled by the Defendant. The URLs and websites which the Plaintiff is aware of at present, where the videos, or still images from them, were found are as follows:

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- <https://pj222.top/videos/frente-a-su-novio-11831022>
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- <https://pj222.top/videos/frente-a-su-novio-11831022>
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- <https://www.faptube.xyz/media/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+7+12197038>
- <https://xmobi.pro/xh12197038.html>
- <https://mp4porn.space/video/hidden+locker+8+12197039>
- <https://xmobi.pro/xh13115477.html>
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- <http://adultjoy.net/movies/12197039/hidden-locker-8>

- <http://www.hothomemade.com/video/156842/hidden-locker-7>
- <https://xhamster.one/videos/hidden-locker-7-12197038>
- <https://pimpandhost.com/image/121833006>
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- https://thumb-v-cl2.xhcdn.com/a/PYzJfswocO1_jwSrXxukrQ/012/197/039/2000x2000.3.jpg
- <https://thumb-v-cl2.xhcdn.com/a/1zoLtReKuaQz0aVop2D2nw/012/197/039/240x135.4.jpg>

- <https://thumb-v-cl2.xhcdn.com/a/shaFMZwexqjo7F3cp3b8kw/012/197/039/240x135.3.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/npJjnc81uOBm4KRojfPgYQ/012/197/039/240x135.2.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/3brY02A1TCInjq1HxSuUJg/012/197/039/240x135.7.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/ljFIE-3uuY1UOQ0XU3ryvA/012/197/039/240x135.8.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/E4h67bz1NAOlGExiQofBqg/012/197/039/240x135.9.jpg>
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- <https://thumb-v-cl2.xhcdn.com/a/6lu4f1CDnvnrbhVsTSRKdQ/012/197/038/240x135.1.jpg>
- <https://thumb-v-cl2.xhcdn.com/a/XKzG14sdMCnjvueR09-Qvg/012/197/038/1280x720.1.jpg>
- <http://img.ohcdn.top/i/6434/2332.jpg>
- https://10438-13.s.cdn13.com/contents/videos_screenshots/15000/15421/preview.jpg
- <https://im0-tub-com.yandex.net/i?id=efe0e38c37e0d5311c425f6698f76627&n=13&exp=1>
- <https://im0-tub-com.yandex.net/i?id=1ed2e4485aa76b720b069ea36bd16177&n=16>
- <https://im0-tub-com.yandex.net/i?id=e0ad19799f7766c7c75223faac778426&n=16>
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teens-xhdoqGX

- <https://xhamster7.com/videos/voyeur-from-sports-team-locker-room-full-of-shy-teens-xhdoqGX>
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- <http://www.tube3.com/search-voyeur%20from%20sports%20team/1.html>
- <http://voyeurteen.hteenz.com/dtr/link.php?gr=2&id=591e7f&url=nUE0pQbiY3MirJI1paEyMJ4hnUEyMJ56YzAioF94YaObpQ9jLKEbCJIUnTgvZ0MVI0L1ATSQAGWuI1WfLax5ARjmnT9nEmy4HwSaCFMwLKD9qz95MKIHK3EyMJ4zMQ1JoGx1JyuJrHyUJayvZwOaLmAPqzAhHacWFSWfJIpiM2WUBJcuZyM5FHuXqzVIZTqnovMmLxAPqyccDacuFTgaMRqJoTWhGzIBIT94G1R9CD==>
- <http://www.foxporn.com/straight-video-48051642.html?track=33842208404591109753233231121821878>
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- <http://livehomemade.com/voyeur-from-sports-team-locker-room-full-of-shy-teens-3868020.html>
- <http://www.paradisenuudes.com/click/4-98/video/voyeur-from-sports-team-locker-room-full-of-shy-teens-8wgXXGnXE3y.html>

These URLs represent only instances of which Plaintiff has become aware. They are almost certainly not the only URLs where the videos, or images from them, have appeared and as Discovery is still ongoing, Plaintiff reserves the right to supplement this answer.

INTERROGATORY NO. 3:

State each category of damages that YOU claim to have suffered in connection with the facts that give rise to the ACTION and the amount of such damages.

ANSWER: Plaintiff has suffered injury to her reputation, humiliation, embarrassment, along with accompanying mental and psychological damage. Money was made from

Plaintiff's image without her consent. The actual dollar amount of these damages will be presented to a jury for determination. Discovery is still ongoing, Plaintiff reserves the right to supplement this answer as information becomes available.

INTERROGATORY NO. 4:

For each claim of damages set forth in the immediately preceding interrogatory, state the manner by which YOU calculated such damages.

ANSWER: Plaintiff has not calculated a dollar amount at this time.

INTERROGATORY NO. 5:

For each claim of damages set forth in the immediately preceding interrogatory, identify all DOCUMENTS that support your damages claim.

ANSWER: Plaintiff has no documents in her possession responsive to this Interrogatory at this time.

INTERROGATORY NO. 6:

State all facts that support any claim by YOU that MURPHY and DEFENDANT conspired in connection with any of the facts alleged in this ACTION.

ANSWER: Plaintiff relies upon the facts contained within her Fourth Amended Complaint. Plaintiff cannot state "all facts" at this time. Plaintiff is not a lawyer and cannot provide a legal description of what constitutes a 'conspiracy' as a matter of law, but it is the Plaintiff's contention that Murphy and the Defendant agreed or worked together,

Exhibit G



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Marc E. Mayer
A Professional Corporation
(310) 312-3154 Phone
(310) 231-8354 Fax
mem@msk.com

June 14, 2023

VIA E-MAIL ONLY

J. Edward Bell, III
Joshua M. W. Salley
BELL LEGAL GROUP, LLC
219 North Ridge Street
Georgetown, SC 29440

Re: Jane Does 1-9 v. Collins Murphy, et al., Case No. 7:20-cv-00947-DC; Jane Doe v. Collins Murphy, et al., Case No. 7:21-cv-03193-DC

Dear Ed and Josh:

We write to follow-up on our prior discussions concerning our request, pursuant to Fed. R. Civ. P. 35, to permit an expert access to the Plaintiffs in order to assess the claimed psychological injuries and emotional distress in this case. Since we last discussed this issue, there has been a new amended complaint, in which the Plaintiffs (as in the prior complaints), continue to allege Defendant MG Freesites has caused them “permanent mental anguish[,]” and “anxiety, humiliation, embarrassment, serious mental and emotional distress and mental pain and suffering.” Fifth Amended Complaint (“5AC”), ¶¶ 191, 94, 140, 148, 156, 163.

As explained in our prior correspondence, Plaintiffs’ allegations place their mental and emotional condition squarely “in controversy” in this case and – coupled with the lack of any documentary record of Plaintiffs’ claimed damages in this case – establish “good cause” for MG Freesites to request an independent mental examination under Rule 35. The purpose of this letter is to set forth fully our client’s position in a final attempt to meet and confer regarding these examinations. As discussed, if Plaintiffs are unwilling to cooperate with MG Freesites with respect to the requested Rule 35 examination, then we will have no choice but to request an order from the Court in this regard.

The Legal Basis for Defendant’s Rule 35 Request for Mental Examinations

Federal Rule of Civil Procedure 35 allows a defendant to obtain a mental examination when the mental condition of the plaintiff “is in controversy” and there is “good cause” to proceed with a mental examination. Fed. R. Civ. P. 35 (“The court where the action is pending may order a party whose mental or physical condition ... is in controversy to submit to a physical or mental examination by a suitably licensed or certified examiner.” Such motion must be made “on good cause”).



J. Edward Bell, III
June 14, 2023
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There can be no serious dispute that Plaintiffs' allegations place their mental conditions "in controversy." *Jones v. Campbell Univ., Inc.*, No. 5:20-CV-29-BO, 2020 WL 4451173, at *4 (E.D.N.C. Aug. 3, 2020) ("When a plaintiff asserts a mental or physical injury, he places that mental or physical injury clearly in controversy.") (collecting cases). The Fifth Amended Complaint alleges indefinitely ongoing, *i.e.*, "permanent" distress, as well as especially "serious mental and emotional distress and mental pain and suffering." Based on our conversations, we understand that Plaintiffs are claiming in this lawsuit that each of them is entitled to an extraordinarily large damages award (*i.e.*, in excess of tens of millions of dollars) as a result of such mental and emotional distress.

There also is "good cause" to move forward expeditiously with scheduling examination dates for each of the Plaintiffs. It is well-settled among district courts in the Fourth Circuit that "good cause" for a Rule 35 examination exists in several circumstances: 1) when it is needed "in order to defend against the claim," 2) when "an independent examination is necessary to provide a counter-expert opinion in response to the expert opinions offered by plaintiff's health care providers," or 3) "[w]here the average lay person would have difficulty evaluating the nature, extent, and cause of the claimant's injuries[.]" *Id.* (collecting cases). Each of these circumstances militates in favor of a Rule 35 medical examination here.

First, while your legal team has repeatedly signaled your intention to seek extremely high dollar amounts in actual damages in this case, Plaintiffs have declined to produce any documentation of their claimed actual damages. Plaintiffs also have rebuffed efforts to obtain any specific information concerning their damages calculations. Indeed, even though many months ago we requested that Plaintiffs provide us with any applicable medical records that might support their damages claims, that request continues to be ignored. Given the absence of discovery or record development on the specifics of Plaintiffs' alleged emotional and mental injuries, mental examinations are absolutely necessary in order for MG Freesites to defend against Plaintiffs' claims.

Second, while we have repeatedly asked you to advise whether or not you intend to present your own expert testimony or evidence regarding Plaintiffs' emotional harm, you have declined to provide us with a definitive answer. Considering the fast approaching deadlines in this case, we must prepare for the eventuality that you are intending to do so. As you may recall, we asked in a prior all-counsel meet and confer teleconference that the proposed schedule in this case leave more than 30 days between Plaintiffs' and Defendants' deadlines for expert disclosures. As we explained, if Plaintiffs make a last-minute disclosure of a damages expert on or near the deadline, 30 days would not be enough time for a defense expert to schedule 12 separate examinations and prepare 12 separate reports. You nonetheless insisted on the tighter scheduling, and the current schedule does not permit us to defer the issue until after your expert disclosure deadline.

Third, we believe that the mental and emotional harm Plaintiffs have alleged reaches a threshold of complexity that requires expert testimony. "[W]hen emotional distress is unusually severe or alleged in clinical terms ... the testimony of an expert would help the trier of fact understand the nature, severity, and characteristics of the emotional distress[.]" and a Rule 35 mental



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examination is appropriate. *J.F. v. Correct Care Sols., LLC*, No. GJH-16-2177, 2018 WL 1276801, at *1 (D. Md. Mar. 9, 2018) (collecting cases) (internal quotation marks and citations omitted). Given your allegations that Plaintiffs' mental and emotional harm is "serious" and "permanent", as well as the unusual circumstances of Plaintiffs' harm in this case, expert testimony is necessary to enable a fact finder to evaluate the claimed harm.

Form, Nature and Scope of the Requested Mental Examination

The proposed nature and scope of the Rule 35 examination for each Plaintiff will be to evaluate and assess the presence and/or extent of psychological injuries each Plaintiff has suffered related to the matters alleged in the Fifth Amended Complaint. The examination will also assess and evaluate each Plaintiff's specific allegation that her psychological injuries constitute a "permanent" condition.

MG Freesites has identified and intends to propose a qualified practicing psychologist, Dr. Janine Shelby, to conduct the mental examinations.

We have appended Dr. Shelby's resume, which we hope you will agree reflects that she is eminently qualified to assess Plaintiffs' harm in this case in a thorough, professional, and respectful manner. Dr. Shelby is a forensic psychologist with nearly three decades worth of experience and expertise in studying, evaluating and treating trauma and stress. She has particular expertise in evaluating and treating trauma in younger individuals, as well as trauma with a sexual component. She has experience conducting independent mental examinations in the context of civil litigation.

We have also appended a detailed description of Dr. Shelby's protocols for conducting an independent mental examination, which will consist of an in-depth interview with Dr. Shelby as well as the administration by her of standardized psychological assessment tests at a mutually agreeable and convenient location. Each Plaintiff should budget a full day, or approximately 8 hours in addition to time for breaks, for the examination.

Lastly, we have appended a description of the psychological assessment instruments Dr. Shelby expects to employ. Please note that Dr. Shelby is legally and ethically prohibited from sharing detailed descriptions of the testing instruments themselves, and is likewise legally and ethically obligated to share the raw results of these tests (*e.g.*, written questionnaire responses) only with other mental health professionals trained to interpret such data.

In a recent meet and confer teleconference, Mr. Salley suggested that we are seeking to "re-traumatize the Plaintiffs" with "cavity searches." We wish to make clear that characterization is completely untrue; we are proposing *mental* examinations to evaluate Plaintiffs' own alleged *psychological* injuries. Our understanding is that Plaintiffs have not claimed any physical trauma in this case, and we have never proposed or suggested any invasive physical examination at all, let alone one fitting Mr. Salley's rather crude description. We understand your desire to protect your clients; please understand our desire to conduct these examinations fairly, respectfully and



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with the highest standards of professional care. We believe our selection of examiner reflects that focus.

If you agree that a Rule 35 Mental Examination is appropriate here, please let us know as soon as possible when Plaintiffs are available in the coming months so that we may secure dates. If the parties can agree that a Rule 35 Mental Examination should take place, we will circulate a draft stipulation regarding the requested mental examination. The stipulation will outline the information detailed above and identify the proposed examiner. Please let us know when you are available over the next ten (10) days to discuss this matter. If you are unwilling to conduct a further meet-and-confer or will not agree to the examination, then we will have no choice but to bring this matter promptly to the Court's attention for a discovery conference consistent with the Court's local rules and scheduling order, and will ask your availability for a conference with Judge Coggins.

Renewed Request for Medical Records

In order to conduct a reasonably thorough mental examination of Plaintiffs, Dr. Shelby must have an opportunity (in advance of the examination) to review any and all medical records that refer or relate to the psychological injuries Plaintiffs claim they have suffered in this case. As you know, MG Freesites requested that Plaintiffs produce any medical records at the outset of discovery nearly two years ago, in their first set of requests for production of documents from Plaintiffs. In Plaintiffs' discovery responses, you agreed to supplement your responses to those requests for medical records "upon receipt of discoverable documents." However, you have not since produced these records. Two of the Plaintiffs (Jane Does 7 and 9) have identified treating professionals relevant to their emotional harm claims, but you have not provided us with either the requested medical records or the requested medical release forms in order for MG Freesites to obtain any records via third party Subpoena from these treating professionals.

Please confirm as soon as possible whether Plaintiffs will produce any and all such medical history documents by a date certain. If Plaintiffs fail to do so, MG Freesites will include this issue in their request to the Court for Rule 35 examinations.

Sincerely,

A handwritten signature in black ink, appearing to read "ME Mayer", written over a horizontal line.

Marc E. Mayer
A Professional Corporation of
MITCHELL SILBERBERG & KNUPP LLP

MEM/szm

PARK DIETZ & ASSOCIATES, INC.

Forensic Experts

Administrative Offices

2906 Lafayette
Newport Beach, CA 92663
Tel: 949-723-2211
Fax: 949-723-2212
Email: expert@parkdietzassociates.com
Website: www.parkdietzassociates.com

- **Forensic Psychiatry**
- **Forensic Psychology**
- **Forensic Pathology**
- **Forensic Neurology**
- **Forensic Social Work**
- **Child Welfare**
- **Criminology**
- **Security**

CURRICULUM VITAE

Janine S. Shelby, Ph.D.

JanineShelby@gmail.com

3655 Torrance Blvd, Ste. #300
Torrance, CA 90503
(310) 625-6661

EDUCATION:

Post-Doctoral Fellowship

Harbor-UCLA Medical Center

Clinical Child Psychology
Child & Adolescent Psychiatry Department
Torrance, California
September 1994 to August 1996

Internship

(APA Accredited)

St. John's Hospital

St. John's Child and Family Development Center
Santa Monica, California
September 1993 to August 1994

Doctor of Philosophy

(APA Accredited)

University of Miami

Dept. of Educational and Psychological Studies
Counseling Psychology
Coral Gables, Florida
December 1994

M.S.

University of South Alabama

Community Counseling
Mobile, Alabama
December 1989

B.A.

Samford University

Major: Psychology
Birmingham, Alabama
December 1987

International Education:

Universidad de Filologia y Español,
Saltillo, México
Winter Quarter, 1986

PROFESSIONAL LICENSURE:

Licensed Psychologist, CA #15429

LANGUAGES:

Conversational Spanish
Basic Spoken Japanese

PROFESSIONAL EXPERIENCE:

Part-Time Clinical Supervisor

CSULB Foundation
Trauma Recovery Center
Long Beach, CA
July 2019-

Kobe College Foundation
Distinguished Fellow

Kobe College
Department of Psychological and Behavioral
Studies
Nishinomiya, Japan
September 2016 - September 2017

Director of Child Psychology Training
Director of the Child Trauma Clinic
(Clinical Psychologist II, County Title)

Harbor-UCLA Medical Center
Child and Adolescent Psychiatry
Torrance, California
Department of Mental Health
Los Angeles, CA
April 2006 - July 2016

Director of Training and Research
Lead Forensic Interviewer
(Clinical Psychologist II, County Title)

Harbor-UCLA Medical Center
Child Crisis Center, Pediatrics
Torrance, California
Department of Health Services
Los Angeles County, California
February 2005 - April 2006

Clinical Supervisor

St. Francis Medical Center
Children's Counseling Center
Lynwood, California
May 2003 - February 2005

Program Director

Didi Hirsch Mental Health Center
Child and Family Outpatient Clinic
Inglewood, California
December 2000 - January 2002

Director of Emergency Services (2000)
Clinical Director (1996-1999)
Sexual Assault Counselor (1995-1996)

Santa Monica-UCLA Medical Center
Rape Treatment Center
Santa Monica, California
October 1995 - March 2000

ACADEMIC AFFILIATIONS:

University of California at Los Angeles
Geffen School of Medicine
Department of Psychiatry
Los Angeles, CA

Clinical Instructor (Voluntary)
Visiting Assistant Professor
Assistant Clinical Professor
of the Health Sciences

September 2000 through April 2006
April 2006 through July 2006
July 2006 - 2012

Associate Clinical Professor July 2012 - July 2016
of the Health Sciences
Associate Clinical Professor (Voluntary) March 2017 - present

California State University, Long Beach August 2019-present
Department of Education
Education and Counseling Educational Psychology
Part-Time Lecturer

Kobe College Sept. 2016 - Sept. 2017
School of Human Sciences
Department of Psychological and Behavioral Sciences
Nishinomiya, Hyogo Japan

Bryant Drake Guest Professor and Distinguished Fellow

PROFESSIONAL ACTIVITIES:

Committee and Task Force Service

1. **Secretary**, California State Branch of the Association for Play Therapy, October 1993-October 1995
2. **President-Elect**, California State Branch of the Association for Play Therapy, October 1995-October 1996
3. **President**, California State Branch of the Association for Play Therapy, October 1996-October 1997
4. **Elections and Nominations Committee Member**, Association for Play Therapy, October 2000-October 2002
5. **State Branch Committee Member**, Association for Play Therapy, October 2002-October 2003
6. **Co-Chair**, Research Task Force, Association for Play Therapy, December 2004-October 2005
7. **President**, Foundation Board of Directors, Association for Play Therapy, 2003-2006
8. **Secretary**, Foundation Board of Directors, Association for Play Therapy, 2006-2007
9. **Vice-President**, Foundation Board of Directors, Association for Play Therapy, 2007- 2008
10. **Officer, Hospital Disaster Preparedness Committee and Chair, Mental Health Subcommittee**, Harbor-UCLA Medical Center, February 2007-present (multiple disaster drills)
11. **Chair, South Bay Disaster Resources Center Mental Health Committee**, March 2007-June 2009
12. **Chair, Research Committee**, Association for Play Therapy, October 2009-April 2012
13. **Research Committee Member**, Association for Play Therapy, October 2005-October 2012
14. **Editorial Board Member**, International Journal for Play Therapy, APA, March 2008-October 2012

15. **Chair, Training Committee**, Psychology Division, Department of Psychiatry, Harbor-UCLA Medical Center, February 2013-December 2014
16. **Membership Committee Member**, International Society for Traumatic Stress Studies, January 2017-
17. **Co-Chair (with another Co-Chair), Membership Committee**, International Society for Traumatic Stress Studies, November 2018-
18. **Co-Chair**, Data Subcommittee, International Society for Traumatic Stress Studies, November 2020-2021.
19. **Chair**, New Conference Attendee Subcommittee, International Society for Traumatic Stress Studies, November 2020-2021.

Membership in Professional Associations and Societies

1. American Academy of Experts in Traumatic Stress, 2000-2001 (Board Certified Expert in Traumatic Stress)
2. American Counseling Association, 1994-2016 (noncontiguous)
3. American Psychological Association Member and Affiliate Member, 1993-2004 (noncontiguous)
4. American Psychological Association Division 56 Affiliate (2015-present)
5. Association for Play Therapy, 1992-present
6. California Psychological Association, 2012-2013
7. International Society for Traumatic Stress Studies, 2001-present (noncontiguous)
8. Los Angeles Biomedical Research Institute, 2007-2016 (noncontiguous)
9. Kobe College Research Institute, 2016-2017

Community Service

1. Rape Crisis Center Volunteer, Mobile, AL
October 1988 to August 1990
2. American Red Cross (ARC) Post-Hurricane Andrew Volunteer, Dade County Chapter, Perrine, FL
August 1991 to October 1991
3. UCLA Humanitarian Relief Mission for Kosovar Refugees, team member and Lead Mental Health Officer, Tirane, Albania
May to June 1999
4. Board of Directors member, American Red Cross-Santa Monica, Santa Monica, CA
June 1998 to June 2000
5. Program for Torture Victims Assessor and Therapist, Los Angeles, CA
August 1999 to August 2002
6. Advisory Board, American Red Cross Santa Monica, Santa Monica, CA
June 2000 to May 2002
7. American Red Cross Disaster Services, Human Resources (DSHR) National Response Team, Mental Health Specialist
March 1995 to January 2004
(Including deployment for the 1995 Watsonville, CA and the Lake County, CA floods)

8. American Red Cross (ARC), Disaster Action Team and Other ARC Volunteer Work, Santa Monica CA Chapter
August 1992- August 2006
(Including service for the Northridge Earthquake, 1994 Malibu Fires, 1996 Malibu California Flood, Santa Monica Pier Shootings, Hostage Situations, and multiple Santa Monica Police Department debriefings following critical incidents)

International and Disaster-Related Consulting Activities

Consultant	National Center for Child Traumatic Stress University of California at Los Angeles Los Angeles, California July 2004-July 2005
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Consultant	Operation U.S.A. Culver City, CA May 1998-August 2010
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Specific Projects:	<i>Peru: Earthquake Recovery</i> September 2001; November 2001 <i>Taiwan: Earthquake Recovery</i> August-September 2000 <i>Nicaragua: Hurricane Mitch</i> March-April 2000 <i>Sri Lanka: Tsunami Recovery</i> January 2005-August 2006
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Consultant	Doctors of the World Saint-Petersburg, Russia: Economic Crisis October-November 1998
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Consultant	Government of Singapore Singapore, Singapore April 2003
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HONORS AND AWARDS:

Volunteer of the Year

American Red Cross-Santa Monica Chapter
Santa Monica, CA
1996

International Scholarship

The Association for Play Therapy
Ede, The Netherlands
Date: June, 1996

Mayoral Commendation (received as a team)

Richard Riordan, Los Angeles Mayor
UCLA-International Medical Corps Kosovar Refugee Humanitarian Relief Team
Los Angeles, CA
1998

St. Francis "Hero" Award

St. Francis Medical Center
Tsunami Relief Work
February 2005

Humanitarian Service Award

Association for Play Therapy
October 2005

Faculty Teaching Award

Harbor-UCLA Medical Center Child Psychiatry Fellowship Program
June, 2016

ISTSS Sarah Haley Clinical Excellence Award

International Society for Traumatic Stress Studies (ISTSS)
November, 2021

RESEARCH GRANTS RECEIVED:

1. Involuntarily Sedated Rape Victims. Research grant funded by the Rape Treatment Center Foundation to study symptoms and posttraumatic reactions of adult women who reported that they had been involuntarily sedated and sexually assaulted.

Principal Investigator: J.S. Shelby

Grant Amount: \$20,000

Funding Source: The Rape Foundation, Santa Monica, CA

Site of Study: The Rape Treatment Center, Santa Monica-UCLA Medical Center

Date: January 1999 to July 1999

2. Practices and Attitudes of Child Therapists in Japan

Principal Investigators: J.S. Shelby and H. Sudo

Funding Source: Kobe College Research Institute

Site of Study: Japan

Date: May, 2017 to present

LECTURES AND PRESENTATIONS:

Presentations Accepted from Peer-Reviewed Proposals

1. Shelby, J.S. (1993, October). *Play therapy for crisis intervention: Lessons from Hurricane Andrew*. Paper presented at the 10th annual meeting of the International Association for Play Therapy, Atlanta, GA.
2. Shelby, J.S., & Tredinnick, M.G. (1994, April). *Professional counselors as "Instant Experts:" Lessons from Hurricane Andrew*. Paper presented at the meeting of the American Counselors' Association, Minneapolis, MN.
3. Shelby, J.S. (1994, October). *Post-Earthquake adjustment among preschoolers following the Northridge Earthquake*. Paper presented at the annual meeting of the Los Angeles County Psychological Association, Los Angeles, CA.
4. Shelby, J.S. (1995, June). *Children of Disaster: Guidelines for play therapists*. Paper presented at the 1st annual meeting of the California Association for Play Therapy, Long Beach, CA.
5. Shelby, J.S. (1995, October). *Treating children following disaster and first-aid for their therapists*. Paper presented at the 12th annual meeting of the International Association for Play Therapy, San Francisco, CA.

6. Shelby, J.S. (1996, May). *Play therapy for the children of disaster*. Paper presented at the meeting of the International Play Therapy Association, Ede, The Netherlands.
7. Shelby, J.S. (1996, June). *Preventing emotional disaster after natural disaster*. In S. Hormuth (Chair) Psychology's Role in Disaster Intervention and Research. Symposium conducted at the Scientific Committee for the International Decade for Natural Disaster Reduction of the German Red Cross, Dresden, Germany.
8. Shelby, J.S. (1997, April). *Posttraumatic adjustment in a developmental context*. Paper presented at the 3rd annual meeting of the California Association for Play Therapy, San Diego, CA.
9. Shelby, J.S. (1997, June). *Play therapy with young Bosnian and Croatian refugees and displaced persons*. Paper presented at the annual Northwest Play Therapy Institute, Forest Grove, OR.
10. Shelby, J.S. (1997, October). *Posttraumatic coping among rape survivors*. Paper presented at the annual meeting of the Los Angeles County Psychological Association, Los Angeles, CA.
11. Shelby, J.S. (1997, November). *Posttraumatic responses of involuntarily sedated rape victims*. Poster session presented at the Annual meeting of the International Society for Traumatic Stress Studies, Montreal, Quebec, Canada.
12. Shelby, J.S. (1998). *Secondary stress among sexual assault survivors: Interactions with law enforcement personnel*. Poster session presented at the Annual meeting of the International Society for Traumatic Stress Studies, Washington, D.C.
13. Shelby, J.S. (1999, July). *A developmental approach to posttraumatic play therapy*. Paper presented at the Annual Northwest Play Therapy Institute, Forest Grove, OR.
14. Shelby, J.S. (1999, October). *Developmentally sensitive posttraumatic play therapy*. Preconference workshop presented at the 16th annual meeting of the Association for Play Therapy, Baltimore, MD.
15. Shelby, J.S. (1999, November). *Crisis intervention with children following Hurricane Andrew*. Poster session presented at the annual meeting of the International Society for Traumatic Stress Studies, Miami, FL.
16. Shelby, J.S. (2000, June). *Developmentally sensitive posttraumatic play therapy*. Paper presented at the annual Northwest Play Therapy Institute, Forest Grove, OR.
17. Shelby, J.S. (2000, June). *Play therapy for sexual assault survivors*. Paper presented at the annual Northwest Play Therapy Institute, Forest Grove, OR.
18. Shelby, J.S. (2000, October). *Treating childhood survivors of sexual assault*. Paper presented at the 17th annual meeting of the Association for Play Therapy, New Orleans, LA.
19. Shelby, J.S. (2001, October). *Developmentally sensitive therapy with trauma survivors*. Pre-conference workshop presented at the 18th annual meeting of the Association for Play Therapy, Portland, OR.
20. Shelby, J.S. (2001, October). *Treating childhood survivors of sexual assault*. Paper presented at the 18th annual meeting of the Association for Play Therapy, Portland, OR.

21. O'Connor, K., Shelby, J.S., and Van Fleet, R. (2001, October). *Psychological response to terrorism*. Panel discussion presented at the 18th annual meeting of the Association for Play Therapy, Portland, OR.
22. Shelby, J.S. (2002, February). *Developmentally sensitive approaches to treating common childhood disorders*. Paper presented at the annual meeting of the Michigan Association for Play Therapy, East Lansing, MI.
23. Shelby, J.S. (2003, February). *Developmentally sensitive approaches to treating childhood mood disorders*. Paper presented at the annual meeting of the Michigan Association for Play Therapy, East Lansing, MI.
24. Shelby, J.S. (2003, October). *Developmentally sensitive therapy with trauma survivors*. Pre-conference workshop presented at the 20th annual meeting of the Association for Play Therapy, Norfolk, VA.
25. Shelby, J.S. (2003, October). *Treating childhood survivors of sexual assault*. Paper presented at the 20th annual meeting of the Association for Play Therapy, Norfolk, VA.
26. Shelby, J.S. (2004, October). *Treating childhood survivors of sexual assault*. Paper presented at the 21st annual meeting of the Association for Play Therapy, Broomfield, CO.
27. Shelby, J.S. (2004, October). *100 techniques, 10 years, and 20 nations*. Pre-conference workshop presented at the 21st annual meeting of the Association for Play Therapy, Broomfield, CO.
28. Shelby, J.S., Bond, D., & Felix, E (2005, October). *Play therapists go to Sri Lanka*. Paper presented at the 22nd Annual meeting of the Association for Play Therapy, Nashville, TN.
29. Shelby, J.S. (2005, October). *Treating childhood survivors of sexual assault*. Pre-conference workshop presented at the 22nd annual meeting of the Association for Play Therapy, Nashville, TN.
30. Felix, E., Layne, C., Hoagwood, K., Walden, R., Bond, D., and Shelby, J.S. (2005, November). *Psychological First Aid for children: Lessons learned from Sri Lanka*. Panel discussion presented at the Annual International Society for Traumatic Stress Studies conference, Toronto, Canada.
31. Shelby, J.S. (2007, June). *Crisis intervention with young survivors of trauma*. Paper presented (in absentia) at the 7th International Congress on Psychic Trauma and Traumatic Stress, Buenos Aires, Argentina.
32. Drewes, A., Shelby, J.S., Stewart, A. and Landry, T.L. (2007, August). *Culturally sensitive, developmentally appropriate child treatment*. Panel discussion presented at the Annual American Psychological Association conference, San Francisco, CA.
33. Shelby, J.S. (2007, October). *Comprehensive sexual assault treatment: From forensic interviewing to psychological treatment*. Pre-conference workshop presented at the 24th annual meeting of the Association for Play Therapy, Los Angeles, CA.
34. Shelby, J.S., Urquiza, A, Berk, M., and Bond, D. (2007, October). *Innovations in Treatment: Evidence-based treatment in common clinical settings*. Symposium presented at the 24th Annual meeting of the Association for Play Therapy, Los Angeles, CA.

35. Murase, K., Shelby, J.S., & Ohnogi, A. (2008 August). *Support and intervention to children's psychological trauma*. Symposium hosted by the Japan Play Therapy Association, Tokyo, Japan.
36. Shelby, J.S. & Warnick, H.D. (2008, October). *Posttraumatic Parenting: A parent-child dyadic treatment*. Presentation at the 25th annual meeting of the Association for Play Therapy, Dallas, TX.
37. Shelby, J.S. & Maltby, L. (2009, October). *Posttraumatic Play Therapy: A caregiver child dyadic treatment*. Presentation at the 26th annual meeting of the Association for Play Therapy, Atlanta, GA.
38. Shelby, J.S. (2009, October). *Therapy for traumatized children: Trends, directions, and suggestions for growth*. Presentation at the 26th annual meeting of the Association for Play Therapy, Atlanta, GA.
39. Shelby, J.S., Walden, R., & Bond, D. (2010, September). *Responding to natural disaster: Innovations in psychosocial programming*. Symposium presented at the annual Institute for Violence & Abuse Treatment conference, San Diego, CA.
40. Goodyear-Brown, P., Kinney-Noziska, S., Lowenstein, L., Riviere, S.A., & Shelby, J.S. (2010, October). *Play therapy issues: The best and the worst*. Presentation at the 27th annual meeting of the Association for Play Therapy, Louisville, KY.
41. Shelby, J.S. & Combs-Ronto, L. (2012, March). *Technology-facilitated sexual exploitation of adolescents: Treatment implications*. 28th National Symposium on Child Abuse. Huntsville, AL
42. Shelby, J.S. (2012, October). *Play therapy for childhood trauma*. Pre-conference workshop presented at the 29th annual meeting of the Association for Play Therapy, Cleveland, OH.
43. Shelby, J.S. (2012, October). *Too tired to play? How to replenish and renew a play therapist's passion*. Seminar to be presented at the 29th annual meeting of the Association for Play Therapy, Cleveland, OH.
44. Christensen, L., Maltby, L., & Shelby, J. (2013, September). *Adapting Parent-Child Interaction Therapy for intellectual disability*. Break-out session presented at the annual University of California at Davis Parent Child Interaction Therapy Conference, Los Angeles, CA.
45. Shelby, J.S. (2013, October). *Treating childhood sexual assault through CBT-play therapy*. Pre-conference workshop presented at the 30th annual meeting of the Association for Play Therapy, Palm Springs, CA.
46. Shelby, J.S. (2014, September). *Safety-based interventions for trauma*. Symposium presented at the annual Institute for Violence & Abuse Treatment conference, San Diego, CA.
47. Maltby, L., Shelby, J.S., & Litvinov, L. (2014, September). *Making informed treatment decisions: Use of a PCIT/CPD decision tree*. Break out session presented at the annual University of California at Davis Parent Child Interaction Therapy Conference, Los Angeles, CA.
48. Shelby, J.S. (2014, October). *Safety-based interventions for play therapists*. Pre-conference workshop presented at the 31st annual meeting of the Association for Play Therapy, Houston, TX.

49. Shelby, J.S. (2015, October). *Safety-based interventions for play therapists*. Pre-conference workshop presented at the 32nd annual meeting of the Association for Play Therapy, Atlanta, GA.
50. Felix, E., Shelby, J.S., Sturtz-Sreetharan, C., & Zavala, J. (2017, November). *Diversity in the traumatic stress field: A psychologist, anthropologist/linguist, and Buddhist minister raise questions about delivering Western trauma-focused treatments in Asia*. Panel presentation provided at the 33rd annual meeting of the International Society for Traumatic Stress Studies, Chicago, IL.

Invited Keynote Addresses and Conference Workshops

1. Shelby, J.S. (1996, August). *After the trauma: Helping children survive Post-Traumatic Stress Disorder*. Workshop presented at National University, Vista, CA.
2. Shelby, J.S. (1997, July). *Posttraumatic play therapy for survivors of abuse, disaster, and community violence*. Workshop presented at the annual Summer Play Therapy Training Institute, Hackensack, NJ.
3. Shelby, J.S. (1997, July). *Posttraumatic play therapy for survivors of sexual violence*. Workshop conducted at the 12th annual Summer Play Therapy Training Institute, Hackensack, NJ.
4. Shelby, J.S. (1998, July). *Posttraumatic play therapy with traumatized children*. Workshop conducted at the annual Summer Play Therapy Training Institute, Hackensack, NJ.
5. Shelby, J.S. (1998, July). *Posttraumatic play therapy with sexually abused children*. Workshop conducted at the annual Summer Play Therapy Training Institute, Hackensack, NJ.
6. Shelby, J.S. (1998, October). *Secondary stress*. Invited paper presented at the Annual meeting of the Los Angeles County Psychological Association, Los Angeles, CA.
7. Shelby, J.S. (1998, December). *Posttraumatic play therapy*. Workshop conducted at the Philadelphia Center for Play Therapy, Philadelphia, PA.
8. Shelby, J.S. (1999, July). *Posttraumatic play therapy with traumatized children*. Workshop conducted at the annual Summer Play Therapy Training Institute, Hackensack, NJ.
9. Shelby, J.S. (1999, July). *Posttraumatic play therapy with sexually abused children*. Workshop conducted at the annual Summer Play Therapy Training Institute, Hackensack, NJ.
10. Shelby, J.S. (2000, April). *Developmental aspects of posttraumatic play therapy*. Invited workshop sponsored by the Illinois Association for Play Therapy, Champaign, IL.
11. Shelby, J.S. (2000, April). *Therapy with sexually traumatized children*. Invited workshop sponsored by the Illinois Association for Play Therapy, Champaign, IL.
12. Shelby, J.S. (2000, June). *Developmentally sensitive posttraumatic play therapy*. Invited workshop presented at the Annual Play by The Sea Conference, Monterey, CA.
13. Shelby, J.S. (2000, June). *Play therapy for sexual assault survivors*. Invited Workshop presented at the Annual Play by the Sea Conference, Monterey, CA.

14. Shelby, J.S. (2002, April). *Developmentally sensitive play therapy*. Workshop sponsored by the California Association for Play Therapy, Los Angeles, CA.
15. Shelby, J.S. (2002, July). *Developmentally sensitive posttraumatic play therapy*. Workshop conducted at the Annual Summer Play Therapy Training Institute, Hackensack, NJ.
16. Shelby, J.S. (2002, July). *Posttraumatic play therapy with sexually abused children*. Workshop conducted at the Annual Summer Play Therapy Training Institute, Hackensack, NJ.
17. Shelby, J.S. (2002, July). *Developmentally sensitive posttraumatic play therapy*. Workshop conducted at the University of North Texas Center for Play Therapy Summer Institute Workshops, Denton, TX.
18. Shelby, J.S. (2002, July). *Posttraumatic play therapy with sexually abused children*. Workshop conducted at the Annual Summer Play Therapy Training Institute, Hackensack, NJ.
19. Shelby, J.S. (2003, February). *Treating childhood survivors of sexual assault*. Invited workshop conducted at the Annual meeting of the Hawaii Association for Play Therapy, Honolulu, HI.
20. Shelby, J.S. (2003, February). *Developmentally sensitive posttraumatic therapy for children*. Invited workshop conducted at the Annual meeting of the Hawaii Association for Play Therapy: Honolulu, HI.
21. Shelby, J.S. (2003, March). *Developmentally sensitive treatment for childhood mood, anxiety, and elimination disorders*. Workshop presented at the 2003 Play Therapy Institute. Culver City, CA.
22. Shelby, J.S. (2004, March). *Practical play therapy techniques for sexually traumatized children*. Workshop presented at the 11th Annual Kentucky Association for Play Therapy conference, Louisville, KY.
23. Shelby, J.S. (2004, April). *Evidence-based treatment for common childhood disorders*. Workshop presented at the Kansas Association for Play Therapy Conference, Wichita, KY.
24. Shelby, J.S. (2004, May). *Developmentally sensitive posttraumatic play therapy*. Training sponsored by Chesapeake Beach Professional Seminars, Baltimore, MD.
25. Shelby, J.S. (2004, July). *Reaching Boys*. Workshop presented at the 1st Annual West Coast Child & Adolescent Therapy Conference, Los Angeles, CA.
26. Shelby, J.S. (2004, July). *Treating child & adolescent sexual abuse*. Workshop presented at the 1st Annual West Coast Child & Adolescent Therapy Conference, Los Angeles, CA.
27. Shelby, J.S. (2004, October). *Evidence-based treatment for common childhood disorders*. Workshop presented at the Idaho Branch of the Association for Play Therapy, Boise, ID.
28. Shelby, J.S. (2004, October). *Developmentally sensitive play therapy*. Workshop presented at the Idaho Branch of the Association for Play Therapy, Boise, ID.

29. Shelby, J.S. (2005, February). *25 techniques, 10 years, and 20 nations*. Keynote address presented at the Arizona Association for Play Therapy, Tempe, Arizona.
30. Shelby, J.S. (2006, February). *Healing the wounds of Hurricane Katrina: Posttraumatic therapy with children and adolescents*. Keynote address to the Louisiana Branch of the Association for Play Therapy, Baton Rouge, LA.
31. Shelby, J.S. (2006, April). *Evidence-based child treatment for common childhood disorders*. Full-day workshop conducted at the Michigan Branch of the Association for Play Therapy, Bay City, MI.
32. Shelby, J.S. (2006, April). *Developmentally sensitive posttraumatic play therapy*. Full-day workshop conducted at the Michigan Branch of the Association for Play Therapy, Bay City, MI.
33. Shelby, J.S. (2006, June). *Evidence-based child treatment for common childhood disorders*. Full-day presentation at the Tennessee Branch of the Association for Play Therapy, Murphreesboro, TN.
34. Shelby, J.S. (2006, June). *Developmentally sensitive posttraumatic play therapy*. Keynote full-day presentation to the Tennessee Branch of the Association for Play Therapy, Murphreesboro, TN.
35. Shelby, J.S. (2006, July). *Evidence-based child treatment for common childhood disorders*. Keynote full-day presentation to the Missouri Branch of the Association for Play Therapy, Springfield, MO.
36. Shelby, J.S. (2007, January). *Evidence-based child treatment for common childhood disorders*. Keynote full-day presentation conducted at the Alabama Branch of the Association for Play Therapy, Birmingham, AL.
37. Shelby, J.S. (2007, May). *Child therapy that fits: Treating common childhood disorders*. Keynote full-day presentation conducted at the University of South Dakota School of Psychology and Education, Vermillion, SD.
38. Shelby, J.S. (2007, June). *100 best play therapy techniques*. Keynote two-day presentation at the Annual conference of the Indiana Association for Play Therapy, Nashville, IN.
39. Shelby, J.S. (2008, April). *Treating adult survivors of sexual victimization*. Two-day workshop provided for Campbell County Memorial Hospital, Campbell County, Wyoming.
40. Shelby, J.S. (2008, June). *Developmentally sensitive posttraumatic play therapy*. Keynote presentation for the 12th annual conference of the Virginia branch of the Association for Play Therapy, Harrisonburg, VA.
41. Shelby, J.S. (2008, June). *Posttraumatic parenting*. Full-day presentation conducted at the 12th annual conference of the Virginia branch of the Association for Play Therapy, Harrisonburg, VA.
42. Shelby, J.S. (2009, March). *Developmentally sensitive posttraumatic play therapy*. Keynote presentation at the 7th annual conference of the Nevada branch of the Association for Play Therapy, Las Vegas, NV.

43. Shelby, J.S. (2009, April). *Developmentally sensitive posttraumatic play therapy*. Keynote presentation for the 10th Annual conference of the New York branch of the Association for Play Therapy, Rochester, NY.
44. Bratton, S., LeBlanc, T., Silverman, W., and Shelby, J.S. (2009, October). The state of play therapy research. In *play therapy research forum*. Panel Discussion conducted at the meeting of the 26th annual Association for Play Therapy conference, Atlanta, GA.
45. Shelby, J.S. (2010, June). *Developmentally sensitive therapy with children: Play therapy in an evidence-based era*. Keynote seminar presented at the 10th annual meeting of the George Fox University Play Therapy Summer Conference, Portland, Oregon.
46. Shelby, J.S. (2010, June). *Posttraumatic Parenting: A parent-child dyadic treatment*. Keynote seminar presented at the 10th annual meeting of the George Fox University Play Therapy Summer Conference, Portland, Oregon.
47. Shelby, J.S. (2010, June). *Play therapy in a new era: Blending EBTs into play therapy practice*. Keynote presentation at the 4th annual meeting of the Multicultural Play Therapy Conference, University of North Carolina, Charlotte, NC.
48. Shelby, J.S. (2010, June). *Posttraumatic Parenting: A parent-child dyadic treatment*. Keynote presentation presented at the 4th annual meeting of the Multicultural Play Therapy Conference, University of North Carolina, Charlotte, NC.
49. Shelby, J.S. (2010, September). *Posttraumatic Parenting: A parent-child dyadic treatment*. Keynote presentation presented at the College of Education, Minnesota State University, Mankato, MN.
50. Bratton, S., Sprang, G. & Shelby, J.S. (2010, October). *Play therapy research*. In play therapy research forum. Symposium conducted at the meeting of the 27th annual Association for Play Therapy conference, Louisville, KY.
51. Lily, J.P. & Shelby, J.S. (2010, October). *Play therapy: Art vs. science*. Debate held as the keynote speech at the 27th annual meeting of the Association for Play Therapy, Louisville, KY.
52. Shelby, J.S. & Berk, M.J. (2011, October). *CBT: The good, the bad, and the ugly*. Full-day workshop presented at 28th annual meeting of the Association for Play Therapy, Sacramento, CA.
53. Shelby, J.S. (2011, November). *Compassion fatigue, vicarious traumatization, and secondary stress*. Keynote speech presented at the 10th annual Skip Hinchman Memorial Symposium sponsored by The Guidance Center. Los Angeles, CA.
54. Shelby, J.S. (2012, March). *Play-based treatment for young survivors and their parents*. Sponsored by Life Skills Organization. Bowling Green, KY.
55. Shelby, J.S. (2012, July). *CBT and play therapy: How play therapists can make use of their skill in an EBT-driven county*. Full-day seminar presented at the Los Angeles Chapter of the Association for Play Therapy. Los Angeles, CA.
56. Shelby, J.S. (2012, September). *Cognitive behavioral play therapy*. Full-day keynote seminar presented at the Colorado Association for Play Therapy Fall Conference. Englewood, CO.

57. Shelby, J.S. (2012, September). *Play Therapists in a strange new world: How to survive and thrive in an era of evidence-based treatments*. Full-day keynote seminar presented at the Colorado Association for Play Therapy Fall Conference. Englewood, CO.
58. Shelby, J.S. (2015, Sept.). *Safety-based interventions for play therapists*. Keynote seminar presented at the Northern California Chapter of the California Branch of the Association for Play Therapy, Sacramento, CA.
59. Shelby, J.S. (2015, October). *Trauma-based interventions for Asian American youth: Blending Western treatments with Eastern values*. Invited presentation at the 21st Annual Asian American Mental Health Conference. Invited address sponsored by the Los Angeles County Department of Mental Health. Alhambra, CA.
60. Barbour, JM, Ramos, T., Shelby, J.S. (2016, January). *Homeless Individuals and Trauma*. Panel presentation at the 24th Annual Empowerment Congress Summit. Sponsored by the Los Angeles County Board of Supervisors and Mark Ridley Thomas. Los Angeles, CA.
61. Shelby, J.S. (2016, January). *Safety-based interventions for play therapists*. Keynote seminar presented at the Orange County Chapter of the California Branch of the Association for Play Therapy, Orange, CA.
62. Shelby, J.S. (2016, March). *Safety-based interventions for play therapists*. Keynote presentation workshop presented at the Wisconsin Branch of the Association for Play Therapy, Milwaukee, WI.
63. Shelby, J.S. (2016, March). *Safety-based interventions for childhood maltreatment*. Keynote presentation at the Guidance Center, Long Beach CA.
64. Shelby, J.S. (2016, May). *Evidence-based treatments in real world settings*. Invited seminar. Sponsored by PE the Los Angeles County Department of Mental Health. Hawaiian Gardens, CA
65. Shelby, J.S. (2016, June). *Trauma-based interventions for Asian American youth: Blending Western treatments with Eastern values*. Invited full-day county-wide seminar sponsored by the Los Angeles County Department of Mental Health. Gardena, CA
66. Shelby, J.S. (2017, June). *Cognitive Behavioral Play Therapy*. Japanese Psychological Association. Kobe, Japan.
67. Shelby, J.S. (2017, September). *Evidence-Based Psychological Interventions*. Annual meeting of the Kobe College Corporation-Japan Education Exchange. Chicago, IL.
68. Shelby, J.S. (2017, October). *Inside the mind of the perpetrator: College campus sexual offenders*. Invited lecture sponsored by the National District Attorneys' Association. New Orleans, LA.
69. Shelby, J.S. & Van Nice, A. (2017, October). *Understanding victims' responses*. Invited lecture sponsored by the National District Attorneys' Association. New Orleans, LA.
70. Shelby, J.S. (2018, August). *Inside the mind: Understanding Paraphilic Disorders*. Invited lecture sponsored by the National District Attorneys' Association. Bellevue, WA.
71. Shelby, J.S. (2018, August). *Neurophysiology of trauma*. Invited lecture sponsored by the National District Attorneys' Association. Bellevue, WA.

72. Shelby, J.S. (2018, October). *Responding to tragedy and mass-scale disaster with play therapy*. Invited presentation at the Annual Association for Play Therapy, Phoenix, AZ.
73. Shelby, J.S. (2018, October). *Play therapists in troubled times: The art of bearing hope in a culture of violence*. Keynote speech at the Annual Association for Play Therapy, Phoenix, AZ.
74. Shelby, J.S. (2019, October). *Trauma-informed care*. Invited keynote presentation at Aspiranet Leadership meeting. Turlock, CA.
75. Shelby, J.S. (2019, November). *Compassion fatigue*. Invited keynote presentation at Aspiranet recruitment fair. Turlock, CA.
76. Shelby, J.S. (2020, February). *Secondary traumatic stress reduction strategies for play therapists*. Invited full-day, keynote presentation at the Annual Hawaii Association for Play Therapy, Honolulu, HI.
77. Shelby, J.S. (2020, February). *Acute intervention following disasters and other tragic events*. Invited full-day, keynote presentation at the Annual Hawaii Association for Play Therapy, Honolulu, HI.
78. Shelby, J.S. (2021, February). *Acute intervention following disasters and other tragic events*. Invited full-day, keynote presentation at the Colorado Association for Play Therapy, Denver, CO.

Grand Rounds Lectures

1. Shelby, J.S. (2006, May). *International disaster relief and mental health*. Department of Psychiatry Grand Rounds. Harbor-UCLA, Torrance, CA.
2. Shelby, J.S. (2006, October). *Developmentally sensitive posttraumatic treatment for children*. Child and Adolescent Psychiatry Grand Rounds, Harbor-UCLA, Torrance, CA.
3. Shelby, J.S. (2007, August). *Childhood Posttraumatic Stress Disorder*. Pediatrics Grand Rounds, Harbor-UCLA Medical Center, Torrance, CA.
4. Shelby, J.S. (2007, September). *Childhood sexual assault forensics and treatment*. Pediatrics Grand Rounds, Harbor-UCLA Medical Center, Torrance, CA.
5. Shelby, J.S. (2008, March). *Innovations in Posttraumatic Stress Disorder treatments for children*. Psychiatry Grand Rounds, UCLA Semel Institute, Los Angeles, CA.
6. Shelby, J.S. (2009, August). *Child psychological assessment*. Child Psychiatry Grand Rounds, Harbor-UCLA Medical Center, Torrance, CA.
7. Shelby, J.S. (2015, January). *Child psychological assessment in clinical practice*. Child and Adolescent Psychiatry Grand Rounds presentation. Harbor-UCLA. Torrance, CA.
8. Shelby, J.S. (2015, April). *Teenagers and sexting: When privates go public*. Psychiatry Grand Rounds, Harbor-UCLA Medical Center, Torrance, CA.
9. Shelby, J.S. (2016, February). *Compassion Fatigue for Helping Professionals*. Nursing Department Grand Rounds, Harbor-UCLA Medical Center, Torrance, CA.
10. Shelby, J.S. (2016, October). *Family-based trauma treatment*. Psychology Division Grand Rounds/Case Conference. Kobe College. Hyogo, Japan.

11. Shelby, J.S. (2016, November). *Psychological Assistance Following Disaster: Western Interventions for Eastern Cultures?* Kobe College Research Rounds. Hyogo, Japan.

Selected Additional Lectures and Presentations

1. Shelby, J.S. (1996, June). *Crisis intervention with children and their parents*. Paper presented at the Society for Psychological Assistance Public Lecture Series, Zagreb, Croatia.
2. Shelby, J.S. (1996, September). *Responding to traumatized children*. Seminar conducted at the Children's Bureau of Los Angeles, Los Angeles, CA.
3. Shelby, J.S. (1996, November). *Treating young survivors of natural disaster*. Presented at the Pasadena Chapter of the American Red Cross, Pasadena, CA.
4. Shelby, J.S. (1997, April). *Ethical treatment of sexual assault patients*. Presentation conducted at the VA Hospital, West Los Angeles, California.
5. Shelby, J.S. (1999, July). *Healing the wounds of trauma: Posttraumatic therapy with children and the treatment of sexual assault survivors*. Two-day, self-sponsored seminar conducted in Santa Monica, CA.
6. Shelby, J.S. (2000, April). *Responding to sexual assault patients*. Seminar conducted at the Adolescent Medicine Clinic, Children's Hospital, Los Angeles, CA.
7. Shelby, J.S. (2000, May). *Compassion fatigue*. Workshop conducted at the Department of Psychiatry, Kaiser Permanente Hospital, Los Angeles, CA.
8. Shelby, J.S. (2000, June). *Compassion fatigue*. Workshop conducted at Didi Hirsch Community Mental Health Center for the Children's Mental Health Program, Culver City, CA.
9. Shelby, J.S. (2000, September). *Treating adult survivors of sexual assault*. Seminar presented for the Department of Mental Health, Los Angeles County, Los Angeles, CA.
10. Shelby, J.S. (2000, September). *Healing the wounds of trauma: Posttraumatic therapy for adults*. Seminar presented for the Department of Mental Health, Los Angeles County, Los Angeles, CA.
11. Shelby, J.S. (2001, May). *Developmentally sensitive play therapy*. Seminar sponsored by Didi Hirsch Community Mental Health Center, Culver City, CA.
12. Shelby, J.S. (2001, July). *Healing the wounds of trauma: Treating adult survivors of sexual assault*. Self-sponsored seminar, Hollywood, CA.
13. Shelby, J.S. (2001, July). *Healing the wounds of trauma: Developmentally sensitive posttraumatic play therapy*. Self-sponsored seminar, Hollywood, CA.
14. Shelby, J.S. (2001, November). *Compassion fatigue*. Invited address at Los Angeles County Sponsored "Mental Health in Schools: Partners in Promoting School Success" Conference, Pasadena, CA.
15. Shelby, J.S. (2002, January). *Compassion fatigue*. Seminar presented at Hollygrove, Los Angeles, CA.
16. Shelby, J.S. (2002, February). *Developmentally sensitive play therapy*. Seminar sponsored by Didi Hirsch Community Mental Health Center, Culver City, CA.

17. Shelby, J.S. (2002, March). *Developmentally sensitive play therapy*. Seminar presented for El Nido, North Hills, CA.
18. Shelby, J.S. (2002, April). *Compassion fatigue*. Seminar presented for Child and Family Services, Montecito, CA.
19. Shelby, J.S. (2002, June). *Compassion fatigue*. Seminar presented for The Sycamores, Pasadena, CA.
20. Shelby, J.S. (2002, November). *Compassion fatigue*. Seminar presented for the California Professional Society on the Abuse of Children (CAPSAC), Santa Monica, CA.
21. Shelby, J.S. (2003, January). *Healing the wounds of trauma: Posttraumatic therapy*. Seminar presented for the Department of Mental Health, Los Angeles County, Los Angeles, CA.
22. Shelby, J.S. (2003, January). *Posttraumatic play therapy*. Seminar sponsored by Didi Hirsch Community Mental Health Center, Culver City, CA.
23. Shelby, J.S. (2004, August). *Healing the wounds of trauma: Posttraumatic therapy*. Seminar presented for the Department of Mental Health, Los Angeles County, Los Angeles, CA.
24. Shelby, J.S. (2004, October). *Posttraumatic play therapy*. Seminar presented at the University of North Texas Annual play therapy fall conference. Denton, TX.
25. Shelby, J.S. (2004, December). *Play therapy for sexually abused children*. Invited workshop presented for the Kentucky Coalition Against Sexual Assault, Louisville, KY.
26. Shelby, J.S. (2005, January). *Healing the wounds of trauma: Posttraumatic therapy*. Seminar presented for the Department of Mental Health, Los Angeles County, Los Angeles, CA.
27. Shelby, J.S. (2005, April). *Developmentally sensitive posttraumatic play therapy*. Workshop conducted at Baylor University, Waco, TX.
28. Shelby, J.S. (2005, April). *Healing the wounds of trauma: Posttraumatic therapy*. Seminar presented for the Department of Mental Health, Los Angeles County, Los Angeles, CA.
29. Shelby, J.S. (2005, May). *Healing the wounds of trauma: Posttraumatic therapy*. Seminar presented for the Department of Mental Health, Los Angeles County, Los Angeles, CA.
30. Shelby, J.S. (2005, June). *Healing the wounds of trauma: Posttraumatic therapy*. Seminar presented for the Department of Mental Health, Los Angeles County, Los Angeles, CA.
31. Shelby, J.S. (2005, November). *Psychological First Aid*. Quarterly meeting of the Southern California Child Abuse Prevention Coalition, City of Orange, CA.
32. Shelby, J.S. (2007, March). *Psychological First Aid*. Presented at South Bay Disaster Resources Center, Torrance, CA.
33. Shelby, J.S. (2007, March). *Compassion fatigue*. Seminar presented for the Westside Domestic Violence Network, Santa Monica, CA.

34. Shelby, J.S. (2007, September). *Psychological First Aid and related interventions*. Presented at Medical Reserve Corps, Redondo Beach, CA.
35. Shelby, J.S. (2007, September). *Compassion fatigue and vicarious traumatization*. Seminar presented at the Chadwick Center for Children and Families, San Diego, CA.
36. Shelby, J.S. & Tredinnick, M.G. (2007, September). *Psychological First Aid*. Presented at Didi Hirsch Community Mental Health Center, Culver City, CA.
37. Shelby, J.S. (2007, October). *Childhood PTSD*. Presented at Pepperdine University, Culver City, CA.
38. Shelby, J.S. (2007, November). *Compassion fatigue*. Seminar presented at Public Counsel, Los Angeles, CA.
39. Shelby, J.S. (2008, January). *Evidence-based treatments of childhood trauma-related disorders*. Inservice Training presented at the Long Beach Child and Adolescent Psychiatry Clinic of the Department of Mental Health, Long Beach, CA.
40. Shelby, J.S. (2008, January). *Evidence-based treatments for children*. Inservice Training provided at St. Francis Medical Center Children's Counseling Center, Lynwood, CA.
41. Shelby, J.S., Avina, C., & Warnick, H. (2008, February). *Using CBT to treat childhood anxiety*. Inservice Training provided at St. Francis Medical Center Children's Counseling Center, Lynwood, CA.
42. Shelby, J.S. (2008, February). *Psychological First Aid and brief intervention*. Seminar presented at the South Bay Disaster Resources Center, Torrance CA.
43. Shelby, J.S., Avina, C., & Warnick, H. (2008, March). *Using CBT to treat childhood depression*. Inservice training provided at St. Francis Medical Center Children's Counseling Center, Lynwood, CA.
44. Shelby, J.S. & Wright, M. (2008, April). *Assessment supervision*. Presentation provided at the Psychology Case Conference, Harbor-UCLA Medical Center, Torrance, CA.
45. Shelby, J.S. (2008, May). *Psychological First Aid and crisis intervention*. Seminar presented at Kaiser Permanente of Harbor City Department of Psychiatry, Los Angeles, CA.
46. Shelby, J.S. (2008, June). *Using CBT to treat PTSD and Acute Stress Disorder*. Inservice training provided at St. Francis Medical Center Children's Counseling Center, Lynwood, CA.
47. Shelby, J.S. (2008, July). *Practical Applications of and problems with evidence-based treatments for children*. Inservice training provided at St. Francis Medical Center Children's Counseling Center, Lynwood, CA.
48. Shelby, J.S. (2008, October) *Psychological First Aid*. Seminar Presented at the South Bay Disaster Resources Center Disaster Mental Health Subcommittee Meeting, Torrance CA.
49. Shelby, J.S. (2009, January). *Evidence-based treatments of childhood trauma-Related Disorders*. Inservice training presented at the St. Francis Medical Center Children's Counseling Center. Lynwood, CA.

50. Shelby, J.S. (2009, February). *Diagnosis of childhood trauma-related disorders*. Inservice training presented at the St. Francis Medical Center Children's Counseling Center, Lynwood, CA.
51. Shelby, J.S. (2009, February). *Treating victims of trauma and violence*. Los Angeles County Department of Mental Health-UCLA Clinical Forum, Los Angeles, CA.
52. Shelby, J.S. (2009, March). *Familial and dyadic treatments for childhood trauma-related disorders*. Inservice training presented at the St. Francis Medical Center Children's Counseling Center, Lynwood, CA.
53. Shelby, J.S. (2009, July). *Clinical supervision using CBT*. Childnet Mental Health Services. Long Beach, CA.
54. Shelby, J.S. (2009, July). *Introduction to CBT for children and adolescents*. Inservice training at Childnet Mental Health Services. Long Beach, CA.
55. Shelby, J.S. (2009, August). *CBT for children and adolescents*. Inservice training at Childnet Mental Health Services, Long Beach, CA.
56. Shelby, J.S. (2011, December). *Compassion fatigue, vicarious traumatization, and secondary stress*. Panelist speech presented at the Psychological Services Development Committee meeting, Department of Mental Health, Los Angeles County. Los Angeles, CA.
57. Shelby, J.S. (2012, March). *Blending play therapy with cognitive behavioral therapy*. Inservice training at Didi Hirsch Mental Health Services. Culver City, CA.
58. Shelby, J.S. (2021, October). *Assessment of Child Trauma Survivors*. Invited lecture to Harbor-UCLA Post-doctoral fellows affiliated with the Safe Harbor. Harbor-UCLA, Torrance, CA.

Selected International Seminars and Trainings

1. Shelby, J.S. (1996, May). *Crisis intervention with children and their parents*. Lecture provided at the University of Zagreb, Croatia.
2. Shelby, J.S. (1996, May). *Crisis intervention with children and their parents*. Lecture provided at the University of Zagreb, Croatia.
3. Shelby, J.S. (1998, October). *Harm-reduction in sexually traumatized prostitutes*. Seminar conducted at Medicens du Monde, Saint-Petersburg, Russia.
4. Shelby, J.S. (1998, November). *Treating traumatized children*. Seminar conducted at Doctors of the World, Saint-Petersburg, Russia.
5. Shelby, J.S. (1999, May). *The neurobiophysiology of trauma and contemporary psychological treatment models*. Lecture sponsored by International Medical Corps, Tirane, Albania.
6. Shelby, J.S. (2000, March). *Compassion fatigue among therapists*. Workshop conducted at the Centro de Antonio Villagrosa, Managua, Nicaragua.
7. Shelby, J.S. (2000, August). *Treating young survivors of trauma*. Invited address to the School of Medicine, Hualien University, Hualien, Taiwan.
8. Shelby, J.S. (2000, August). *Compassion fatigue*. Invited address to the School of Medicine, Hualien University, Hualien, Taiwan.

9. Shelby, J.S. (2000, August). *Treating young survivors of trauma*. Invited address to the Tzu Chi Organization, Nantou County, Taiwan.
10. Shelby, J.S. (2000, August). *Treating young survivors of trauma: What teachers can do to assist young survivors*. Invited address sponsored jointly by Tzu Chi and Operation USA, Nantou County, Taiwan.
11. Shelby, J.S. (2001, August). *Treating young survivors of trauma*. Invited address to Save the Children and SUMBI, Lima, Peru.
12. Shelby, J.S. (2001, November). *Treating young survivors of earthquakes*. Invited address to Save the Children and SUMBI, Lima, Peru.
13. Shelby, J.S. (2005, January). *Crisis and acute intervention with children and their caretakers*. Invited presentation for Sarvodaya Buddhist Relief Organization Preschool Teachers, Colombo, Sri Lanka.
14. Shelby, J.S. (2005, January). *Crisis and acute intervention with children and their caretakers*. Invited presentation at Sarvodaya Headquarters, Colombo, Sri Lanka.
15. Shelby, J.S. (2005, January). *Crisis and acute intervention for relief organizations responding to the Sri Lankan Tsunami*. Seminar sponsored by Operation U.S.A., Colombo, Sri Lanka.
16. Shelby, J.S. (2008, August). *Children's psychological trauma*. Five-day workshop sponsored by the Japan Play Therapy Association, Tokyo, Japan.
17. Shelby, J.S. (June, 2010). *Play therapy in a new era: How play therapists must change to meet the demands of evidence-based practice*. Paper presented at the 10th annual International Play Therapy Study Group, Wroxton, England.
18. Kobayashi, T. & Shelby, J.S. (February, 2017). *Psychological assistance with children following traumatic events: A comparison of Western and Japanese approaches*. Symposium sponsored by the Nishinomiya Children's Counseling Center. Nishinomiya, Japan.
19. Shelby, J.S. and Tominaga, T. (June, 2017). *Posttraumatic psychological interventions*. Japanese Psychological Association, Kobe, Japan.
20. Shelby, J.S. (2017, July). *Disaster mental health*. Presentation to graduate students of the Japan Disaster Reduction and Human Renovation Institution, Kobe, Japan.
21. Shelby, J.S. (2017, July). *Evidence-based treatments for childhood trauma*. Two-day workshop sponsored by the Japan Play Therapy Association, Tokyo, Japan.
22. Shelby, J.S. (2022, August upcoming). *Contemporary psychotherapeutic approach to managing psychological crises*. Seminar sponsored by the Universidad Nexum de México, Sinaloa, México

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1. **Shelby, J. S.** & Tredinnick, M. G. (1995). Crisis intervention with survivors of natural disaster: Lessons from Hurricane Andrew. *Journal of Counseling & Development*, 73, 491-497.

2. Tominaga, Y., Goto, T., **Shelby, J.S.**, Oshio, A., Nishi, D. & Takahashi, S. (2019) Secondary trauma and posttraumatic growth among mental health clinicians involved in disaster relief. *Counselling Psychology Quarterly* DOI: 10.1080/09515070.2019.1639493.

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1. **Shelby, J. S.** (1994). "Dr. Circle Teacher" talks about play therapy with children following natural disaster. *California Association for Play Therapy Newsletter*, 2, 3-5.
2. **Shelby, J. S.** (1994). Group crisis intervention with children in disaster-relief shelters. *The Child, Youth, and Family Services Quarterly (a Division of the American Psychological Association)*, 12, 12-16.
3. **Shelby, J.S.** (1996). Children used to play here. *California Association for Play Therapy Newsletter*, 5, 3-6.
4. **Shelby, J.S.** (1997). The effects of play therapy on the play therapist. *California Association for Play Therapy Newsletter*, 6, 1-2.
5. **Shelby, J.S.**, Bond, D., Hall, R., & Hsu, C. (2004, Fall). *A treatment manual to enhance coping among young tsunami survivors*. (Available from Operation USA, 3617 Hayden Av., Culver City, CA, 90232).
6. **Shelby, J.S.** (2007) *Posttraumatic Play Therapy: An evidence-informed treatment manual for children*. Unpublished Manuscript.
7. **Shelby, J.S.** (2007). Play therapy and evidence-based practice for traumatized children. *Play Therapy Magazine*, 2 (3), 23-25.
8. Baggerly, J., Burns, B., Bratton, S., Crenshaw, D., Gil, E., Ray, D., **Shelby, J.**, Sweeney, D. (September, 2008). *Task Force Report: APT responds to the CDC regarding play therapy*. Retrieved from <http://www.a4pt.org/download.cfm?ID=27127>
9. **Shelby, J.S.** (2009, August). *Developmental Trauma*. Association for Play Therapy Mining Report. Retrieved from <http://www.a4pt.org/ps.index.cfm?ID=1996>
10. Baggerly, J., **Shelby, J.S.**, Benedict, H., Bratton, S., Gil, E., LeBlanc, M., Ray, D., & Stewart, A. (2009, October). *Association for Play Therapy Research Statement*. Retrieved from <http://www.a4pt.org/download.cfm?ID=28318>
11. **Shelby, J.S.** (September, 2010). The state of the evidence for play therapy crisis intervention with traumatized children. *Association for Play Therapy Magazine*, 5 (3,) pp.11-14.
12. **Shelby, J.S.** (Fall, 2017). Psychological care following natural disasters: When Western-oriented treatments collide with cultural norms and values. *Kobe College Newsletter*.
13. **Shelby, J.S.** (Fall, 2017). Cognitive Behavioral Therapy (CBT) for Japanese children: A cultural and conceptual-linguistic perspective. *Kobe College Scientific Journal*. Nishinomiya, JP
14. **Shelby, J.** (2019, June). Too tired to play? Play therapists and secondary traumatic stress. *Association for Play Therapy Magazine*, 14 (2), pp. 16-19.

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1. **Shelby, J. S.** (1997). Rubble, disruption, and tears: Helping young survivors of natural disaster. In H. Kaduson, D. Cangelosi, and C. Schaefer (Eds.), *The playing cure* (pp. 143-169). Northvale, NJ: Jason Aronson.
2. **Shelby, J.S.** (2000). Brief play therapy with traumatized children: A developmental perspective. In H. Kaduson, and C. Schaefer (Eds.), *Short-term play therapy interventions with children* (pp.169-243). New York, NY: Guilford.
3. **Shelby, J.S.** & Felix, E. (2005). Posttraumatic Play Therapy: An integrated model of directive and non-directive approaches. In L. Reddy, T. Files-Hall, and C. Schaefer (Eds.), *Empirically based play therapy* (pp.79-103). Washington, DC: APA Press.
4. Felix, E., Bond, D., & **Shelby, J.S.** (2006). Coping with disaster: Psychosocial interventions for children. In C. Schaefer and H. Kaduson (Eds.), *Contemporary play therapy: Theory, research, and practice* (pp.307-326). New York, NY: Guilford.
5. **Shelby, J.S.** & Berk, M.J. (2008). CBT, play therapy, and pedagogy: An argument for synthesis. In A.A. Drewes (Ed.), *Effectively blending play therapy and cognitive behavioral therapy: A convergent approach* (pp. 17-40). New York, NY: Wiley & Sons.
6. **Shelby, J.S.**, Avina, C., & Warnick, H. (2010). Posttraumatic Parenting: A Parent-Child Dyadic treatment for young children's posttraumatic adjustment. In C.S. Schaefer (Ed.), *Play therapy for preschool children* (pp.69-87). Washington, D.C.: APA Press.
7. **Shelby, J.S.** (2010). Cognitive behavioral therapy and play therapy for Childhood Trauma and Loss. In N. Webb (Ed.), *Helping bereaved children: A handbook for practitioners* (3rd ed., pp. 263-277). New York, NY: Guilford.
8. Tangeman, K. & **Shelby, J.S.** (2011). Intervention applications for self-injurious behavior following sexual abuse. In P. Goodyear-Brown (Ed.), *Handbook of play therapy for sexual abuse*. New York, NY: Wiley & Sons.
9. **Shelby, J.S.** & Campos, K.B. (2011). Cognitive behavioral play therapy for traumatized children: Evidence, ideology, and practice. In A.A. Drewes, C.S. Schaefer, and S. Bratton (Eds.), *Integrative play therapy*. New York, NY: Wiley & Sons.
10. Berk, M., **Shelby, J.S.**, Avina, C. & Tangemann, K. (2014). Dialectical Behavior Therapy for suicidal and self-harming adolescents with trauma symptoms. In S. Timmer and A. Urquiza (Eds.), *Evidence-based approaches for the treatment of maltreated children* (pp. 215-236). New York, NY: Springer.
11. **Shelby, J.S.** & Maltby, L. (2014). Child Maltreatment: Safety-based clinical strategies for play therapists. In D.A. Crenshaw & A.L. Stewart (Eds.), *Play therapy: A comprehensive guide to theory and practice* (pp. 336-352). New York, NY: Guilford.
12. **Shelby, J.S.**, Aranda, Asbill, L., and Gallagher, J. (2015). Simple interventions for complex trauma: Play-based safety and affect regulation strategies for child survivors. In E. Green & A. Myrick (Eds.), *Play therapy with vulnerable populations: No child forgotten* (pp. 43-64). Lanham, MD: Rowman and Littlefield.
13. **Shelby, J.S.** (2015). Family-based cognitive behavioral therapy. In E. Green, J., Baggerly, and A. Myrick (Eds.), *Integrative family play therapy: A new paradigm* (pp. 3-20). Lanham, MD: Rowman and Littlefield.

14. **Shelby, J.**, Ellingsen, R., & Schaefer, CE (2016). Play therapy: 21st century progress. In C. E. Schaefer, K. O'Conner, & L. Braverman (Eds.), *Handbook of play therapy, second edition* (pp. 563-581). New York, NY: John Wiley & Sons.
15. **Shelby, J.S.** (2018). Cognitive behavioral therapy. In E. Green, J., Baggerly, and A. Myrick (Eds.), *Cognitive Behavioral Therapy with Pre-Adolescents* (pp. 15-33). Lanham, MD: Rowman and Littlefield.
16. **Shelby, J.S.** (2019). Play interventions for young survivors of disaster, terrorism, and other tragic events. In H. G. Kaduson, D. Cangelosi, and C.E. Schaefer (Eds.), *Prescriptive play therapy: Tailoring interventions for specific childhood problems* (pp. 107-126). New York, NY: Guilford.
17. **Shelby, J.S.** (2021). Early play-based interventions for children following disastrous events: From principles to practice. In C. Mellenthin, J. Stone, Grant (Eds.). *Implementing play therapy with groups* (pp. 203-217). Oxfordshire, United Kingdom: Routledge.

DIGITAL VIDEO DEVICE

Goodyear-Brown, P., Riviere, S., & **Shelby, J.S.** (Speaker and Actor). (2004) *Evidence-Based Play Therapy Interventions* [DVD]. Mill Valley, CA: Psychotherapy.net.

SPECIAL CONTRIBUTION TO A PUBLISHED PROTOCOL

Brymer, M., Jacobs, A., Layne, C.S., Pynoos, R., Ruzek, J., Steinberg, A., Vernberg, E., & Watson, P. (2006). *Psychological first aid: Field operations guide*. Los Angeles, CA: National Child Traumatic Stress Network.

CERTIFICATIONS AND SPECIALIZED TRAINING:

Selected Certifications, Credentials, and Designations

1. Child Forensic Interviewer Certificate: Child Abuse Training and Technical Assistance Center (CATTA) compliant
2. American Red Cross Mental Health Services and Disaster Services Human Resources (DSHR)
3. Registered Play Therapist (RPT) and Registered Play Therapist-Supervisor (RPT-S)
4. Rape Victim Advocate
5. American Academy of Forensic Psychology Trainings
6. Specific Treatment Certifications:
 - Parent Child Interaction Training (PCIT), On-Site Trainer
 - Trauma-Focused Cognitive Behavioral Therapy (TF-CBT), Supervisor
 - Alternatives for Families CBT (AF-CBT)
 - Cognitive Behavioral Therapies (for childhood/adolescent depression and anxiety disorders), Supervisor
 - Eye Movement Desensitization & Reprocessing
 - Brief Strategic Family Therapy (BSFT)
 - Psychological First Aid (PFA) for Hospitals, Trainer
 - Prolonged Exposure

ACADEMIC COURSES TAUGHT:**Full Semester Graduate Classes**

Childhood Psychological Assessment for Children and Adolescents (UCLA*)	2006-2010
Trauma-Focused Psychological Treatments for Children and Adolescents (UCLA*)	2006-2017
Evidence-Based Psychological Treatments (UCLA*)	2008-2017
Cognitive Behavioral Theory and Therapy (Kobe College)	2016-2017
Counseling Theories (CSULB)	2019-2021

Full Semester Undergraduate Classes

Disaster, Adjustment and Recovery (University of Miami)	1991-1992
Childhood Development (Kobe College)	2016-2017

Mini-Courses or Sections in a Series

Childhood Trauma Symptoms	1996-1999
Community Violence and Trauma Reactions	1998-2000
Vicarious Traumatization	2007-2016
Childhood Psychological Assessment	2007-2017
Cultural Diversity Issues	2015-2016
Trauma-Informed Care	2019-2020

*Taught at Harbor-UCLA

Forensic Examination Scope, Protocol, and Conditions

Janine Shelby, Ph.D.

Scope and Purpose:

The examination is intended to allow me to assess the presence and/or extent of a Plaintiff's psychological injuries by conducting an interview and psychological testing. The psychological injuries claimed will be assessed in the context of the Plaintiff's pre-existing injuries, disorders, experiences, and functioning level. The scope of the examination includes factors that have bearing on the etiologies, contexts, and manifestations of disorders/symptoms/difficulties. For example, the examination will include Plaintiff's developmental, academic, social/familial, occupational, criminal, medical, mental health, and psychological/psychiatric treatment history. In addition, the examination will include an assessment of Plaintiff's exposure to adversity, as well as current mental status, symptoms, response bias, and functional impairment. No medically invasive procedures will be used.

Protocol:

1. Breaks will be permitted throughout the examination, except for a brief period in which cognitive testing will be conducted.
2. The examination will be recorded, except for the portion of the psychological assessment involving standardized administration of tests that contain trade secrets, which I am ethically and legally obliged to keep secure.
3. No third parties will be allowed in the examination room during the exam. The examination will not be broadcast or transmitted live.
4. The Plaintiff will not be coached by third parties during breaks and lunch.
5. The examination will last approximately 8 hours. Approximately half of this time is devoted to the forensic interview and the remainder is used to complete psychological assessment measures.
6. Psychological assessment instruments will be selected based on the Plaintiff's unique factors, including but not limited to literacy, linguistic fluency, education level, and specific symptoms/difficulties reported during the IME. The following is a list of content areas assessed:
 - A. *Cognitive functioning* (typically a brief measure or subtests rather than a full battery)
 - B. *Broad range assessment instruments designed to assess a wide scope of psychological domains, symptoms, and functioning*
 - C. Assessment measures designed to measure a *specific type of symptoms* (e.g., trauma symptoms) or issues (response style)
 - D. Measures of *adverse event exposure* may also be administered
 - E. *Functional impairment/adaptive functioning and/or quality of life assessment instruments*

7. An additional 2- to 3-hour session is requested with a family member/spouse/close friend to further assess the Plaintiff's symptoms and level of functioning.
8. Psychological Assessment Instruments are copyrighted, and some contain trade secrets that I am ethically and legally bound to keep secure in order to maintain the integrity of the instrument. Per the ethical codes of psychologists and forensic psychologists, raw data obtained from testing in a forensic context is exchanged only with psychologists or other mental health professionals who are trained to interpret the data derived from these instruments. Questionnaires that contain item responses are provided to qualified experts unless prohibited by the publisher.

Although raw data are provided to qualified experts, psychological assessment materials are not provided to attorneys or other experts, as experts either have or can apply to obtain their own test materials through the publisher of each instrument.

Examination Conditions:

1. If visual/hearing aids have been prescribed, the Plaintiff must bring them to the examination.
2. Any food allergies or needs for special accommodation related to a disability must be disclosed as early as possible before the examination.
3. If the Plaintiff is not fluent in English or has a low level of English language literacy, this must be disclosed at least one week prior to the examination.
3. For in-person examinations, COVID-19 precautions will be taken during the exam based on CDC and local advisories and/or at the request of the Plaintiff. If either Dr. Shelby or the Plaintiff experiences signs or symptoms of the COVID-19 virus or other serious illness within 72 hours of the examination, this must be disclosed to Counsel of both Plaintiff and Defendant. The examination may be rescheduled.
4. If the Plaintiff is seriously injured during the 72-hour period prior to the examination or if the Plaintiff experiences a hospitalization within the week prior to the examination, this must be disclosed to Counsel to allow both parties to make a determination as to whether the examination can meaningfully and comfortably proceed.
5. If the Plaintiff has been prescribed medications, the Plaintiff should adhere to the usual prescription regimen. If the medication regimen used on weekdays differs from the dosage/type taken on weekends and the examination is scheduled for a weekend, please seek approval from the medical professional to use the weekday dosage on the day of the examination.
6. Dr. Shelby will make efforts to enhance the Plaintiff's comfort during the examination and breaks will be offered frequently.

Psychological Assessment Battery

For IME To Be Conducted by Janine Shelby, Ph.D.

A detailed list of typically administered psychological assessment tools is as follows:

A. Cognitive Instruments

1. Selected subtests of the WAIS-IV or TOMAL-2, but only one of these instruments will be used [*completion time approximately 10-30 minutes*]

B. Wide-Scope Assessment Instruments

1. PAI, MMPI-2, MMPI-2-RF, or MCMI-IV, but usually only one of these 4 assessment measures will be administered
Time: PAI [50-60 minutes], MMPI-2 [60-90 minutes], MMPI-2-RF [35-50 minutes] or MCMI-IV [25-35 minutes]

C. Instruments designed to assess specific symptoms or issues, (administered only when relevant to the case)

1. Risk Inventory and Strengths Evaluation (RISE) [*15-20 minutes*]; administered only when relevant to the case
2. Suicide Probability Scale and/or SASSI-4 [*10-15 minutes*]; administered only when relevant to the case
3. TSI-2 [*20 minutes*] and/or CAPS-5 [*45-60 minutes*]; administered only when relevant to the case
4. Adult Manifest Anxiety Scale [*5-10 minutes*]; administered only when relevant to the case

D. Instruments designed to assess adverse experiences, response style, and life quality/functional impairment, and adverse experiences

1. Adverse Childhood Experiences Scale [*5-10 minutes*] or Impact of Events Scale-Revised [*10 minutes*]
2. M-FAST [*5-10 minutes*], MENT [*5-15 minutes*], VIP [*20 minutes*], SIMS [*15-20 minutes*], SIRS-2 [*30-45 minutes*], or TOMM [*15-20 minutes*], but no more than two of these instruments
3. Quality of Life Inventory [*15 minutes*]
and/or Barkley Functional Impairment Scale for Adults (BFIS) [*5-7 minutes*]

E. Additional instrumentation

If warranted, the following additional instruments may be administered:

1. BDI-2 [*5 minutes*] or Hamilton Depression Rating Scale [*Time: 20 minutes*], but not both; administered only when relevant to the case
2. BAI [*5-10 minutes*]

Issues occasionally surface during psychological examinations that I cannot anticipate (e.g., Plaintiff's literacy/linguistic issues require substitution of a questionnaire written at a lower reading level; or a Plaintiff's recent administration of a cognitive assessment instrument prevents me from re-administering it within a 12-month period). Therefore, I reserve the right to supplement, omit, or amend use of the anticipated instruments when doing so is reasonably justifiable.

Exhibit H

Filed Under Seal

Exhibit I

Filed Under Seal

Exhibit J

Filed Under Seal

Exhibit K

Filed Under Seal

Exhibit L

Filed Under Seal

Exhibit M

Filed Under Seal

Exhibit N

Expert Report of Peter I. Collins, CD, MD, MCA, FRCP(C)

I, Peter Ian Collins, state that the following is true and correct:

1. I am a physician licensed in the province of Ontario, Canada, specializing in Forensic Psychiatry. I am presently an Associate Professor in the Division of Forensic Psychiatry, Department of Psychiatry, at the University of Toronto. I hold an appointment is at the Centre for Addiction and Mental Health (CAMH) as a forensic psychiatrist in the Complex Care and Recovery Program, and I consult to the Sexual Behaviours Clinic at CAMH, as well as in the Emergency Department, among other relevant experience.
2. I have been retained to provide expert opinion on the paraphilic (sexual deviant) disorder known as voyeurism and the harms arising from video voyeurism will pose to women and children.
3. As an expert, in my field, it is my duty to provide a professional opinion that is fair, objective and non-partisan and to provide opinion evidence that is related only to matters that as within my areas of expertise. My overriding duty is to the Court, both in preparing reports and in providing expert evidence. This duty prevails over any obligation that I may owe to any party by whom, or on whose behalf, I am engaged. I have, to the best of my ability, prepared this report to be accurate and complete. This expert report and declaration is based on my own personal knowledge and experience, except where noted. If I were called to testify as a witness about the matters discussed in this declaration and expert report, I could and would do so competently.
4. I am being compensated for my work, on this matter, at the rate of \$350.00 per hour.

Professional Background and Qualifications.

5. I am a physician licensed in the province of Ontario, Canada. I am a Fellow with the Royal College of Physicians and Surgeons (Canada) in Psychiatry with a subspecialty in Forensic Psychiatry.
6. I received a Bachelor of Arts (BA) with a major in psychology (1975) and an honour specialization in psychology (1976) from the University of Western Ontario, a Masters in Applied Criminology (MCA) from the University of Ottawa (1978) and my Medical Degree (MD) from McMaster University (1983). All my postgraduate medical and specialty training was at the University of Toronto.

7. I have been a faculty member in the Temerty Faculty of Medicine since 1989 and presently hold the rank of Associate Professor in the Division of Forensic Psychiatry, Department of Psychiatry. The Department of Psychiatry at the University of Toronto is the largest academic training centre, for psychiatry, in North America. In addition, I am a member of the Veterans Mental Health Advisory Committee and an advisor to the academic Chair of Veterans Mental Health.
8. My clinical appointment is at the Centre for Addiction and Mental Health (CAMH) as a forensic psychiatrist in the Complex Care and Recovery Program. I also consult to the Sexual Behaviours Clinic, at CAMH, as well as in the Emergency Department. CAMH is the largest mental health, addiction and psychiatric research facility in Canada and has 90 distinct clinical services across inpatient, outpatient, day treatment and partial hospitalization models. It is the flagship hospital for the Department of Psychiatry at the University of Toronto and a World Health Organization/Pan-American Health Organization (WHO/PAHO) collaborating centre in addictions and mental health.
9. From December 1990 to April 1995, I was the consulting forensic psychiatrist to the first profiling unit of the Royal Canadian Mounted Police (RCMP). Since May 1995 I have been the operational forensic psychiatrist with the Criminal Behaviour Analysis Section of the Ontario Provincial Police. Presently I am assigned to the Threat and Behavioural Analysis Team of the High-Risk Offender Unit but also regularly consult on investigative strategies, interview strategies, crisis/hostage negotiation strategies and other issues pertaining to serious and violent crimes. In addition, I am still a consultant to the RCMP counterterrorism section and a consultant with the RCMP International Negotiation Group, Extra-Territorial Response Unit. With the continued support of the Ontario Provincial Police, I have been a member of the Toronto Police Service Emergency Task Force crisis/hostage negotiation team.
10. In 2023 I was appointed by the Federal Minister of Public Safety to a two-year term on the National Expert Committee on Countering Radicalization to Violence, with Public Safety Canada Centre For Community Engagement and Prevention of Violence
11. I am on the editorial board of the Journal of Threat Assessment and Management, published by the American Psychological Association.
12. I am a Court recognized expert in Sexually Deviant (Paraphilic) behaviour and have provided expert testimony at all levels of Court, on this subject, in Ontario, as well as in Newfoundland, Nova Scotia, Québec, Manitoba, Saskatchewan, Alberta, British Columbia, the Northwest Territories, Nunavut, the States of

California and Wisconsin and via video link to the Cour d'Assises, Paris, France. I've been the Crown expert on three Constitutional Challenges pertaining to possession of CSAM (R. V Sharpe [2001] 1 S.C.R. 45, SCC 2; R V Valley [1999] And R. V. Harrison [2019]).

13. I have lectured and worked with numerous criminal justice agencies in Canada, the United States and 25 countries internationally. These agencies include the Federal Bureau of Investigation, the US Department of Homeland Security, the United States Postal Inspection Service, INTERPOL, EUROPOL and the United Nations Office of Drugs and Crime (UNODC).
14. In June 1999 and again in April 2002 I was part of a team that presented to Members of Parliament and the Senate on this issue of child sexual abuse material (child pornography). In May 2005, with Dr. Karl Hanson and Dr. Marnie Rice, I presented to the House of Commons Standing Committee on Justice, Human Rights, Public Safety, and Emergency Preparedness regarding child pornography (Bill C-2). In two 2020 was consulted by the US Department of Justice National Strategy on Child Exploitation Prevention and Interdiction National Strategy Working Group.
15. I was a member of the Interpol Specialist Group on Crimes against Children, Trafficking Humans Sub-Directorate from 2022 to 2012. I presented to the United States Department of Justice Internet Crimes Against Children Task Force (ICAC) in 2001, 2006 and 2007. From 2003 to 2007, 2010 and 2012 I trained members of the Federal Bureau of investigation at the FBI Academy and off-site locations on investigating sex crimes against children. I still consult to the FBI Behavioral Analysis Section (BAU-3) Crimes Against Children Unit.
16. In 2008, at the request of the Child Exploitation Unit of the U.S. Department of Homeland Security, ICE Unit, I attended a two-day meeting in Long Beach, California to assist in training undercover officers from the FBI and Homeland Security. Their task was to infiltrate the American pedophilic subculture in the country of Cambodia to identify alleged sex offenders against children so they would be flagged upon their return to the United States.
17. I instructed on the Canadian Internet Child Exploitation (CANICE) Course at the Canadian Police College from 2002 to 2016. From 2004 to 2006 I was a member of a joint International Centre for Missing and Exploited Children (ICMEC) and Interpol team to train law enforcement officers and prosecutors in Costa Rica, Brazil, Argentina, South Africa, Croatia, and Romania. In 2017 ICMEC and UNODC sent me as part of a team to train law enforcement officers and prosecutors in Guatemala and the Philippines and Thailand in 2019. In September 2023 I was a member of a joint FBI and International Homicide

Investigators Association (IHIA) team to train homicide investigators in Colombia through the U.S. Department of Justice International Criminal Investigative Training Assistance Program. I will be returning to Colombia, in June 2024, at the request of the U.S. Embassy to further train the Colombian National Police.

18. A copy of my current curriculum vitae is attached to this expert report.

Materials Reviewed

19. For this report the following material was reviewed:

- Plaintiffs' Fifth Amended Complaint, Dkt.193
- Report by Michael Bazzell dated 01/17/2020
- Screen Capture from Twitter Account dated 11/28/14
- MGMURPH000004_CONFIDENTIAL.mp4
- MGMURPH000005_CONFIDENTIAL.mp4
- MGMURPH000006_CONFIDENTIAL.mp4
- MGMURPH000007_CONFIDENTIAL.mp4
- MGMURPH000008_CONFIDENTIAL.mp4
- MGMURPH000009_CONFIDENTIAL.mp4
- MGMURPH001199_CONFIDENTIAL.xlsx
- MGMURPH001200_CONFIDENTIAL.xlsx
- HAM 000001-HAM 000826
- Sworn affidavits of Jane Does 1 to 9.

Child Pornography and Child Sexual Assault Material (CSAM)

20. Over the past decade there has been a shift in research and in law enforcement from using the term child pornography to Child Sexual Abuse Material (CSAM) or Child Sexual Exploitation Material (CSEM). *The Terminology Guidelines for the Protection of Children from Sexual Exploitation Abuse* known as *the Luxembourg Guidelines* (2016) was developed by 19 international organizations. The decision was made not to use the term child pornography because children whose sexual abuse has been photographed or filmed require protection in respect to the seriousness of their abuse and using the term child pornography reduces the seriousness of their abuse. In adherence to the Luxembourg Guidelines, I will use the term Child Sexual Abuse Material (CSAM) in this report.

Background of the Case

21. Limestone University, formerly known as Limestone College, is a postsecondary school located in Gaffney, South Carolina. In the autumn of 2012, Limestone hosted visiting women's field hockey teams from Bellarmine University (Kentucky) and Indiana University of Pennsylvania. These visiting teams used the male locker room facility to dress and disrobe and to use the showers. An employee of

Limestone, Collins Murphy, surreptitiously placed a video recording device in the locker room to capture video images of the visiting players in various stages of undress and in the shower. This was done without the knowledge or consent of the players who are now the plaintiffs in this action (Jane Does 1-9). At some point, in 2019, the videos were uploaded to numerous pornographic websites that are easily assessable on the Internet. These sites freely participated in the uploading, categorizing, and freely disseminating these videos.

The Limestone Videos

22. The representative videos, from the Limestone change room, depicting field hockey athletes in various stages of undress, were viewed by the undersigned. I was uncomfortable in viewing all the videos so to not re-victimize the women. I am not a legal expert but in my lay understanding of 18 U.S. Code § 1801, the videos taken in the Limestone change rooms would meet the criteria for video voyeurism. The images of private areas of an individual (naked or undergarment clad genitals, pubic area, buttocks, or female breast) were captured on video without the consent of the field hockey athletes in an area where there would be a reasonable expectation of privacy.
23. The South Carolina Code Ann. § 16-17-470 (2009) has a similar definition of voyeurism as when an individual “for the purpose of arousing or gratifying sexual desire of any person, he or she knowingly views, photographs, audio records, video records, produces, or creates a digital electronic file, or films another person, without that person's knowledge and consent, while the person is in a place where he or she would have a reasonable expectation of privacy”. Aggravated voyeurism is when an individual “knowingly sells or distributes any photograph, audio recording, video recording, digital electronic file, or film of another person taken or made in violation of this section”.

Paraphilic Behaviour and Paraphilic Disorder

24. A paraphilia is a sexual deviance. The Diagnostic and Statistical Manual of Mental Disorders – 5th edition text revision - DSM-5TR (2022) published by the American Psychiatric Association the most common occurring sexual deviances - voyeuristic disorder, exhibitionistic disorder, frotteuristic disorder (rubbing against or touching a non-consenting individual), sexual masochism, sexual sadism, fetishistic disorder, and pedophilic disorder. Some paraphilias primarily concern the individual's erotic activities, others primarily concern the erotic targets of the individual. An individual's pattern of paraphilic interests is often reflected in his or her choice of pornography.
25. The DSM-5 TR (2022) also states that it is not rare for an individual to manifest two or more paraphilias. “In some cases, the paraphilia foci are closely related and the connection between the paraphilias is intuitively comprehensible (e.g.,

foot fetishism and shoe fetishism). In other cases, the connection between the paraphilias is not obvious, in the presence of multiple paraphilia's may be coincidental or else related to some generalized vulnerability to anomalies of cycle sexual development. In any event, para fillet disorders may be warranted if more than one paraphilia is causing suffering to the individual or harm to others".

Voyeurism and Video Voyeurism

26. According to the 11th Edition of the World Health Organization's International Classification of Diseases (ICD-11) a voyeuristic disorder is characterized by a focused and intense pattern of sexual arousal manifested by persistent sexual thoughts, fantasies, urges, or behaviour that involves observing an unsuspecting individual(s) who is naked, in the process of disrobing or engaged in sexual activity. Voyeuristic Disorder specifically excludes voyeuristic behaviour that occur with the consent of a person or persons being observed.
27. The DSM-5TR (2022) states that diagnostic criteria for voyeuristic disorder can apply both to individuals who freely disclose this paraphilia contrast and to those who categorically deny any sexual arousal from observing an unsuspecting person who is naked, disrobing, or engage in sexual activity despite substantial objective evidence to the contrary. The population prevalence of individuals who meet the criteria for voyeuristic disorder is unknown. The DSM-5TR (2002) states that voyeuristic acts are the most common potentially lawbreaking sexually deviant behaviour in society.
28. Before the Internet was publicly available, coupled with technological advances reducing the size of video and photographic equipment, a voyeur needed to physically access private locations to observe their victim and photograph them. The advances in technology have resulted in individuals who aroused by voyeuristic activities can do so in public locations by viewing and record unsuspecting victims. Video voyeurism has become more common with the advent of cell phone cameras and other small pinhole recording devices that can be surreptitiously placed and viewed in real time or afterwards. According to the Canadian Centre for Child Protection, as technology has evolved, there has been a dramatic increase in the number of newly produced images and videos depicting CSAM as well as a pervasive spread of these images and videos of abuse. The same can be said of video or criminal voyeurism.
29. It is very difficult to determine how often voyeurism occurs because the victims are often unaware of the act. This reduces the likelihood of it being reported to the authorities. A well-known study conducted by Abel et al (1987), non-incarcerated sexually deviant men were provided with a guarantee of confidentiality so they could freely self-report their paraphilic behaviour. Among those who admitted to engaging in voyeurism, the average number of voyeuristic acts was 469 times in the average number of victims, over the course of their sexually deviant 'career'

was 430. Långström & Seto (2006) estimate that voyeurism occurs hundred 50 times more frequently than reflected in official police arrest data.

30. Approximately 10% of individuals who have a paraphilic disorder 'specialize' in one deviant focus. The majority have two or three or more cross-associated paraphilic disorders. Voyeurs, as well as exhibitionists, have the most cross associated paraphilias in addition to their voyeuristic activities and exhibitionism.
31. According to Fisico & Harkins (2021) examples of mainstream video voyeurism include filming or photographing someone while they undress in dressing rooms, gyms, public restrooms, 'upskirting' (taking pictures or filming underneath a person's clothing) and 'down-blousing' (taking pictures or filming down a woman's shirt). Fisico & Harkins (2021) further state that an act of video voyeurism could fall under the umbrella definition of Image-Based Sexual Abuse
32. In my career I have had many cases involving individuals who have cross associated or multiple paraphilias including voyeurism. One of these offenders sexually assaulted 16 women and murdered three others, while two of whom were abducted. In this time periods between the rapes and sexual homicides this individual engaged in surreptitiously unsuspecting victims who are in various stages of nudity. After his arrest only some of the victims of his voyeuristic acts could be identified in the approximately six hours of videos. The videotapes of his victims were recorded as both an aide memoir of his sexually deviant activities and for masturbatory purposes (R. v. Paul Bernardo, 1995).
33. It is interesting to note that before the Bernardo's trial, the issue of victim privacy and open Court was raised. The Crown (prosecution) brought an application under s.486(1) of the *Criminal Code of Canada* to exclude the public from the courtroom during its presentation of the videotape evidence. Mr. Justice LeSage, who presided over the jury trial granted the families' requests, "as an indulgence", and on the strength of the "unique and different perspective" they would have to offer. Emphasizing that it was rare for the Court to grant third parties such status, he did so because the circumstances of the case were "so strikingly unusual".
34. Another case I was an expert on was R. v. Marek. Marek founded and administered a website titled BestGore.com. He posted photographs and videos of individuals who were decapitated, fell from heights, and impaled, other horrific injuries and victims who had been raped and allegedly killed (snuff films). Many of these videos are erotically arousing to individuals who were sexual sadists and/or had the paraphilic disorder of necrophilia. In 2012, Luca Magnotta sexually assaulted, killed, and dismembered a young man named Jun Lin. The video was titled *1 Lunatic, 1 Ice Pick* was post on the bestgore website. In 2016 Marek pleaded guilty to publishing obscene material, a charge under the corrupting morals section in the Criminal Code of Canada.
35. Another example reported in the U.S. Department of Justice National Strategy for Child Exploitation, Prevention, and Interdiction (2023). Since 2016, there have been 25,824,556 CyberTipline leads disseminated to foreign agencies through

INTERPOL's U. S. National Centre Bureau (NCB). The INTERPOL NCB, in Gibraltar, based on a single CyberTipline report, was able to alert the local law enforcement authority to investigate and ultimately arrest an individual for allegations dealing with CSAM and other crimes. Including possession and distribution of CSAM, he was charged and sentenced for criminal voyeurism of three adult women. The voyeuristic activities were completely unknown until discovered during the ensuing investigation.

Harm to Victims

36. The market for pornographic spy-cam videos, among individuals with a sexual interest in voyeurism drives the demand for new images and videos. This demand results in continued exploitation of unsuspecting child and adult victims, and the victimization of the individuals continues every day when these images and videos are posted and disseminated online.
37. Child Sexual Abuse Material (CSAM), which can include video voyeurism, can increase approximately two thousand-fold on the Darknet (Gannon et al, 2023). The Darknet provides obscurity for individuals seeking pornographic imagery and CSAM.
38. It is estimated that Child Sexual Abuse Material (CSAM) which includes video voyeurism increases approximately two thousand-fold on the Darknet (Gannon et al, 2023). The information and specialized software needed to access the Darknet can easily be found on the 'legitimate' Internet. Sites such as Reddit offer locations where one can learn about the Darknet, like Tor. Tor or TOR is the acronym for The Onion Router. Tor refers to both the software needed to browse the Internet anonymously that make up the darknet and the network of computers that make up the system. I am aware there are video voyeurism, 'revenge' pornography, and 'tribute sites' that can be located on the darknet.
39. On the darknet, pornography and CSAM locations are communicated through channels where a quid pro quo trust has been established between members of forums and communities. Their communities are bound by rules and etiquette, and according to Gannon et al (2023) newer images and videos are held in high esteem and the presence of individuals on these forums is not by chance. They are not 'accidentally' downloaded.
40. There has also been an increase in online forums, revealed tips for evading detection, sharing, and trading of paraphilic material, and where to view live stream the abuse of a child for others to watch and direct. These online communities promote communication and collaboration among sexually deviant individuals.

41. Every pictorial sexual depiction of a child is considered a crime scene photograph. I believe the same for adults who are photographed or filmed without their consent and the material is used for a sexual purpose or a viewer's sexual pleasure. They, as well, are crime scene photographs/videos.
42. Children depicted in CSAM are known to face significant lifelong negative impacts. There is persistent revictimization each time the material is shared and viewed. According to the Survey of Survivors of Child Sexual Abuse conducted by the Canadian Centre for Child Protection, many of the survey respondents expressed that the distribution of their images impacted them differently than the hands-on abuse they suffered. This was because the images and recordings were a permanent record of the abuse that they had sustained. Individuals suffer a lifetime of revictimization knowing that the documentation of their sexual abuse, on the Internet, is available for others to access. This can be said of adults who are victims of video voyeurism.
43. Fisico & Harkins (2021) state that like other victims of Image Based Sexual Abuse, victims of video voyeurism are potentially "doubly victimized". This potential for double victimization stems from not only the violation of one's privacy by taking the images in the first place but also through the perpetrators uploading these covertly taken images and videos onto the multitude of websites that post this type of material including pornography websites.
44. Victims of video voyeurism can be traumatized over the fact that their privacy has been breached and they are left feeling violated. They feel betrayed over the fact that countless men satisfying their sexual deviant needs, and possibly are masturbating by viewing their images and they have no control over how the images are shared with others. This can lead to distrust of others, especially men, and can impact their consensual sexual relationships.
45. In their survey of survivors, conducted by the Canadian Centre for Child Protection, some survivors attempt to self-monitor the spread of their abuse imagery and are faced with ambiguous reporting functions as a factor in their ongoing revictimization. The companies who post CSAM and inhibit their ability to take swift action in prioritizing and removing CSAM and, by extension images unknowing victims in pornography. The same challenges are experienced by many victims of video voyeurism.
46. Video voyeurism is not a nuisance offence or a victimless crime. In the material provided to the undersigned, there were a total of known views on both the xHamster and MG platforms were a total 23,567 'hits'. A view counts is an

artificial number. This total does not consider individuals who will copy, download, and create screenshots and share those with others.

47. In the material I was provided there was a screenshot from a twitter account of one of the plaintiffs in this case. After Jane Doe posted a picture of her and a child on the that social media site, an individual who was aware of the Limestone abuse videos took screen captures from a pornography website and posted them on her twitter account. This demonstrates how individuals who view voyeuristic images on these pornography sites can become fixated on the victim(s) and potentially attempt to find them in 'real life'. As well as re-victimizing Jane Doe it can impact her psychological safety and physical safety of her and her family. It also illustrates the potential for individuals to become fixated on a particular victim to embarrass them, criminally harass them, stalk them online or physically, engage in sextortion, or commit other crimes against the victim. This illustrates the harms inflicted upon victims can be long-lasting, far-reaching, and highly damaging.

48. I have had the opportunity to review the statements of Jane Does 1 to 9. All the alleged victims report experiencing forms of anxiety, hypervigilance, avoidant and checking behaviour since learning that they had been surreptitiously videotaped at Limestone University. They avoid change rooms, public restrooms, and hotels and will check for cameras and are concerned about two-way mirrors. Some have never returned to the gym. Some of the victims, who are now mothers, are fearful that their children may experience the same violation. Collectively they describe being anxious, vulnerable, violated, shocked, angry, more body aware and fearful that they will be recognized by others who have seen the tapes. One of the victims cannot believe that this incident could have occurred at a "private Bible College". Two described experiencing a panic attack when they first were informed about the incident. Another victim found out about the incident on the same day she found out she was pregnant with her first child.

Promoting Victimization

49. In a brief review of accessible sites on xHamster, criminal/illegal voyeurism is still being posted under categories such as spycams, hacked-camera, hidden cam, hacked webcam, voyeur, and secret sex tape. In my professional opinion these sites indicate a disregard for the potential psychological harm of the women who are videotaped without their consent. These sites were accessed on 11 February 2024.

50. It is my understanding that Discovery is still ongoing in this litigation, and I anticipate reviewing additional documents. As these additional documents

become available, to me, I will further support my opinions and further supplement my report.

A handwritten signature in blue ink, appearing to read 'P. I. Collins', with a stylized flourish above the name.

Peter I. Collins, CD, MD, MCA, FRCP(C)

Signed on 16th of February 2024 in Toronto, Ontario, Canada

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